

**Ministry of Finance and Planning
Republic of South Sudan**

**South Sudan Enhancing Community Resilience and
Local Governance Project (ECRP) II (P177093)**

Stakeholder Engagement Plan (SEP)

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List of Acronyms and Abbreviations

AAHI	Action Africa Help International
ACTED	Agency for Technical Cooperation and Development
AF	Additional Financing
BDC	Boma Development Council
CAR	Central African Republic
CERC	Contingent Emergency Response Component
CSO	Civil Society Organization
DRC	Democratic Republic of Congo
DRC	Danish Refugee Council
E&S	Environmental & Social
ECRP	Enhancing Community Resilience and Local Governance Project
EP&R	Emergency Preparedness and Response
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FAO	Food and Agricultural Organization
FGD	Focus Group Discussions
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
IDP	Internally Displaced Person
IFRC	South Sudan Red Crescent
IOM	International Organization for Migration
HDC	Humanitarian Development Consortium
IP	Implementing Partner
IPF	Investment Project Financing
IRC	International Red Cross
IVA	Independent Verification Agent
JRS	Jesuit Refugee Service
LGB	Local Governance Board
LGSDP	Local Governance and Service Delivery Project
MoFP	Ministry of Finance and Planning
MoGCSW	Ministry of Gender, Child and Social Welfare
MWRI	Ministry of Irrigation and Water Resources
NGO	Non-Governmental Organization
NRC	Norwegian Refugee Council
OCHA	Office of the Humanitarian Coordinator
PAP	Project-Affected Person
PDC	Payam Development Council
PMU	Project Management Unit
PDO	Project Development Objective
POM	Project Operations Manual
PPE	Personal Protective Equipment

RRC	Relief and Rehabilitation Commission
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
UNDP	United Nations Development Programme
UNEP	United Nations Environmental Programme
UNFPA	United Nations Population Fund
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UNMISS	United Nations Mission in South Sudan
WASH	Water, Sanitation and Hygiene
WFP	World Food Programme

1. Introduction

Development in South Sudan has been marred by decades of political strife and violence. However, the Revitalized Peace Agreement signed in 2018 provides some hope for movement forward. Nearly a third of the country has been displaced with 8 out of 10 people living below the poverty line and 60 % suffering from some level of food shortage. These challenges are compounded by a lack of institutional readiness to undertake the development needed. Since 2020, the South Sudan Enhancing Community Resilience and Local Governance Project (ECRP) has been filling the critical gap between emergency response and recovery by addressing immediate service needs in areas with a high concentration of returnees, while also strengthening local institutions to better manage their own development in the future.

The second phase of the Enhancing Community Resilience and Local Governance Project (ECRP-II) continue to address immediate needs for basic services in selected areas of the country, while strengthening local institutions' capacity to better manage their own development and intercommunal tensions over services. The project addresses immediate needs for basic services in selected areas of the country, while also strengthening local institutions' capacity to better manage inter-communal tensions and resources. Priority is given to areas with a high concentration of returnees that are also likely to experience increased demands for services, as well as areas with refugees and host communities.

The World Bank and the Government are currently planning to implement Additional Financing (AF) for the Project. The proposed ECRP-II AF entails two key changes: to restructure the project by providing additional resources to the counties targeted under the ECRP-II to support the rehabilitation of damaged community infrastructure and capacity building for emergency preparedness and response (EP&R), and adding a new component for rehabilitation of damaged infrastructure and EP&R capacity building in flood affected areas not covered by ECRP-II.

The World Bank's ESS 10 recognizes the importance of open and transparent engagement with all project stakeholders, based on the recognition that effective stakeholder engagement can improve E&S sustainability of project activities, enhance project acceptance, and implementation, and allow stakeholders to contribute to project design. The key objectives of stakeholder engagement include an assessment of the level of interest and support of the project by stakeholders to promote effective and inclusive engagement with all project-affected parties and to ensure that project information on E&S risks and impacts is disclosed in a timely and understandable way.

This SEP is therefore designed to anchor all ECRP-II stakeholder engagement in a systematic way. It lays out legal and policy requirements in regard to stakeholder engagements, lists engagements already undertaken, provides a stakeholder analysis of all relevant project-affected parties to the ECRP and lays out means of dissemination of information to different parties as well as means and ways to continue to consult different stakeholder groups throughout the project cycle. Furthermore, it contains a monitoring plan that ensures the implementation of the SEP. This Plan helps guide the development of activity-specific or area-specific SEPs, which will be developed once activities and locations are known.

This SEP has been amended to include the additional activities to be covered under the AF.

2. Project Components

The South Sudan Enhancing Community Resilience and Local Governance Project – Phase - II (ECRP-II) AF fills the critical gap between emergency response and recovery by addressing immediate service needs in areas with a high concentration of returnees while strengthening local institutions to better manage their own development in the future, and provides support the rehabilitation of damaged community infrastructure and capacity building for emergency preparedness and response (EP&R).

The Project Development Objective (PDO) is to improve access to services, strengthen flood resilience, and enhance institutional capacity for local service delivery and integrated disaster risk management at the national and sub-national levels.

The original four components are:

Component 1: Infrastructure and Services for Community Resilience supporting the eligible investments in community-level infrastructure and services as well as physical investments for flood risk reduction.

Component 2: Institution Strengthening supports the participatory planning processes for the identification of subprojects to be financed under Component 1, monitoring of the construction of subprojects, and capacity building of relevant national and sub-national institutions.

Component 3: Project Management and Learning providing the overall project management support, including fiduciary management, monitoring and evaluation (M&E), grievance redress mechanism (GRM), third-party monitoring (TPM), and environment and social (E&S) risk management among others.

Component 4: Contingent Emergency Response allowing for rapid reallocation of uncommitted project funds in the event of a natural or man-made crisis in the future, during the implementation of the project, to address eligible emergency needs under the conditions established in its Operations Manual.

The ECRP-II, with AF is being revised to have five Components, with one new component added to the initial four through the AF:

Component 1: Infrastructure and Services for Community Resilience. Budget allocation for Component 1 will be increased from to scale up the investments in community-level infrastructure and services in the more flood-affected counties among the twelve ECRP-II target counties. The AF proposes to prioritize counties that have over 10 percent of the county population that is exposed to floods.

Component 2: Institution Strengthening. Budget allocation for Component 2 will be increased to provide capacity building on emergency preparedness and response (EP&R) to the communities in flood-affected counties among the twelve ECRP-II counties. The training will help communities better prepare for, manage and respond to recurrent flooding. The training will focus on the local (payam and boma) and the county level, to maximize the utility for flood-affected communities. Activities under this component will continue to be implemented by IOM.

Component 3: Emergency Flood Response. A new component will be added to provide emergency flood response activities in the most heavily affected counties in NBeG and Warrap. The component will support

rehabilitation of damaged community infrastructure and services or construction of new infrastructure to reduce flood risks. These are likely to include water supply and sanitation facilities, footpaths and community roads, dykes for flood protection, and health and education facilities, among others. To inject much-needed cash into the flood-affected communities, the community infrastructure will be built to the extent possible in a labor-intensive manner. The physical investments will be coupled with a quick consultative process to identify and validate community priorities, as well as the EP&R training. The community mobilization and engagement process will be more focused and limited compared to the other 12 counties targeted under the parent project considering the emergency. Should there be any pre-existing community institutions, their representativeness and inclusiveness will be assessed, and if found adequate, those institutions will be utilized. Should they not be adequate, or should no viable community institutions exist, communities will be mobilized into Boma Development Committees (BDCs) with the same representation as the other ECRP-II counties. Unlike the more comprehensive capacity-building and training of BDCs undertaken in the parent project, these BDCs will receive focused support for the identification, prioritization, and maintenance of flood response services and infrastructure.

While the activities under Component 3 are relatively similar to those under Components 1 and 2, activities under this component will be implemented much more quickly with less time allocated for community institution strengthening given the nature of the current emergency. Further, this component will have a different implementation arrangement where activities will be implemented by NGOs with a pre-existing geographic footprint and technical expertise in the two target states of NBeG and Warrap.

Component 4: Project Management and Learning. To cover the Government's increased project management costs due to emergency flood response, the budget allocation will be increased.

Component 5: Contingent Emergency Response. The Contingent Emergency Response Component CERC) will now be Component 5.

2.1 Project Locations and Beneficiaries

ECRP-II focuses on counties that are heavily conflict-affected, more food insecure, exposed to natural hazards, and facing increased demand for basic services due to high concentration of IDPs and refugees. It particularly emphasizes refugee and host communities. Taken together, over 455,000 people (approximately 50 percent of whom are women) across four states, 13 out of 79 counties, are directly benefitting from project investments and support.

The AF will target counties in the two most affected states – Northern Bahr el Ghazal (NBeG) and Warrap – as well as the twelve ECRP-II counties, many of which are highly prone to flooding and were affected again during the past flood season. Additional geographical targets under Component 1 will include Leer (Unity state), Fashoda (Jonglei state), Maban (Upper Nile state), Baliet (Upper Nile state) Rubkona (Unity state), Fangak (Jonglei state), Pibor (Greater Pibor Administrative Area), and Twic East (Jonglei state). Flood response activities under Component 3 will target Aweil East, Aweil Center, and Aweil South in NBeG state, along with Gogrial West, Gogrial East, and Tonj East in Warrap state. In total, the AF will cover eighteen counties with an affected population of 592,000 or 54% of the total affected population. The combined targeting allows ECRP-II AF to provide flood response in nine out of ten most flood affected counties. Based on budgetary availability, additional counties may be included in consultation with the

Government. The AF will target the most flood affected counties in NBeG and Warrap States, which have so far not benefitted from investments under the ECRP I and II.

2.2 Institutional Arrangements

The AF builds on ECRP-II's existing institutional structures to oversee and coordinate the project's scaled-up flood response. The parent project is implemented through the Government of South Sudan (GoSS), and a Financing Agreement was signed between the Ministry of Finance and Planning (MoFP) and the World Bank. An output agreement has been signed between the GoSS and IOM for IOM to undertake activities under Component 1 and 2. The PMU established under MoFP and the Local Governance Board (LGB) will continue to coordinate the overall project implementation including supervision of IOM's activities, fiduciary management, environment and social (E&S) due diligence, and monitoring and evaluation (M&E). The inter-ministerial National Steering Committee (NSC) is responsible for providing strategic guidance to the project, while the inter-ministerial National Technical Working Group (NTWG) provides key decisions for project implementation such as geographic targeting or reallocation of funds. approving the inclusion of additional cities into the project, and deciding on the funding allocations across cities. Under the AF, for the scaled-up activities under Component 1, the same implementation arrangements will be followed as shown in **Error! Reference source not found.2**.

Emergency flood response activities will be implemented under a different modality to ensure timely implementation though still under the overarching umbrella of the ECRP-II institutional arrangements. For Component 3 emergency flood response activities, the PMU will engage NGOs with a pre-existing geographic footprint and technical expertise in the two target states of NBeG and Warrap –one NGO per state to minimize the transaction costs. Such an arrangement will allow for: (i) quick roll-out of activities on the ground in areas outside of the parent project and IOM's existing geographic footprint; (ii) greater autonomy for the GoSS to be able to select implementing partners, facilitating the gradual shift to full government-led implementation of these activities; and (iii) avoiding overstressing IOM from its current work in the ECRP-II's 12 counties. The selection of the NGOs will be based on: (i) geographic footprint; (ii) technical expertise on emergency flood response; (iii) adequate absorptive capacity; and (iv) suitable E&S and security risk management mechanisms. The selection of the NGOs will be finalized upon effectiveness of the AF.

2.3 Objectives and Scope of the SEP

The SEP seeks to define a structured, purposeful and culturally appropriate approach to consultation and disclosure of information, in accordance with ESS10. 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 at which they interface with the project. The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders leading to improved decision making. Overall, this SEP serves the following purposes: stakeholder identification and analysis; planning engagement modalities through effective communication, consultations and disclosure; enabling platforms for influencing decisions; define roles and responsibilities for the implementation of the SEP; define reporting and monitoring measures to ensure the effectiveness of the SEP; and elaborating on the role of grievance redress mechanism (GRM).

3. Previous Stakeholders Engagement Activities

Stakeholder Engagements for ECRP-I and ECRP II

In preparation for ECRP-I, IOM conducted consultations in three different areas: Wau, Bor and Rubkona. Furthermore, consultations in Juba, Wau, Tonj North and Kapoeta North Counties were undertaken for the ECRP-I. UNHCR then assisted with consultations for the preparation of the ECRP II in selected refugee camps. In addition, lessons learnt from the implementation of ECRP I, including on the performance of the SEP, have been included in this section. Results of all consultations and lessons learnt have informed this amended SEP. The proposed AF activities and their associated risks and impacts are similar in nature to those of the ECRP II parent project. While the AF will cover different geographical areas, it is not expected that stakeholder responses will be significantly different. The socio-economic background of communities will also be similar. In-depth consultations in the new localities will be implemented prior to the commencement of any activities under component 3 of the Project and this SEP will be updated accordingly.

National Level

Missions conducted with the national government mainly resulted in agreements on the scope of the project, in particular that it addresses basic service delivery needs in vulnerable areas while strengthening local institutions' service delivery capacity. The project's targeting of vulnerable areas particularly the ones with a high concentration of returnees where demand for basic services and inter-communal social cohesion is high was endorsed. The mission also agreed on the following key features: (i) focus on gender (both gender empowerment and gender-based violence mitigation) and youth; (ii) focus on service delivery rather than the construction of infrastructure by leveraging other programs; (iii) put strong emphasis on operation and maintenance (O&M) to whatever extent possible on a cost-recovery basis using a successful public-private partnership model supported by the Netherlands; and (iv) the generation of cash-for-work opportunities to the extent possible.

Consultations with the government further resulted in a selection of geographic targeting principles. The team developed a vulnerability index which aggregates the following five indicators: (i) concentration of returnees; (ii) access to basic services; (iii) food insecurity; (iv) violence; and (v) accessibility. Vulnerability index-based targeting was agreed by the government. The mission explained that the vulnerability index is updated based on latest datasets and the final selection of counties is made. Once the list of possible target counties was determined by the vulnerability index, a more nuanced qualitative assessment was undertaken to identify any "no go" areas that are too insecure or politically too sensitive. The government requested the team share the targeting results with the National Bureau of Statistics.

Agreements were made to finance "quick wins" to deliver tangible results quickly and help build the momentum of the project. The new long list for quick wins contains 7 states and 12 counties with a total of 149 subprojects worth US\$11 million. It was agreed that the final "quick wins" will be selected based on vulnerability and available budget. The combination of "quick wins" and vulnerable counties allows the project to benefit both stable and conflict-affected areas.

As for the relative emphasis of urban/rural areas, Bank-commissioned IOM population movement analysis found little correlation between urbanization and concentration of returnees. According to the study, about 87 percent of returnees go back to places of habitual residence in rural areas. It was thus agreed that the project would predominantly target rural areas.

Community-Level

Conflict and Peace: Community-level consultations have elaborated on a number of different issues. In Wau, for example, people were asked about their perceptions of peace. In this area people have heard about the peace agreements, but there is little trust that peace and its benefits will actually come. People feel that they as civilians are somewhat victimized by different factions. They also mistrust the peace, as they know that soldiers are 'still in the bush'. Their voices also reflect that there is little trust towards politicians, and that they are perceived to put their own interest first. People continue to feel unsafe, with local governments that cannot provide security to its citizens. This is closely connected with economic collapse and an absence of trust between communities. In Bor, for example, people even stated that they feel unsafe inside IDP camps.

Displacement: Furthermore, population movements and displacements are still of major concern in different areas. This is closely connected to deficiencies in government and service provision. In Wau, for example, the administration has little to no capacity to respond to the needs of IDPs and returnees, which leads to the increased relevance of humanitarian actors which diminishes the possibility for self-sufficiency. Government authorities, in turn, complain about the lack of resources. In Rubkona, prevailing insecurity and uncertainty makes IDPs remain in camp sites rather than return to their homes. In fact, families are spreading across different camp sites in order to minimize their risks.

Governments and even customary authorities in Rubkona feel that they have limited capacity to manage all the needs of the war-torn population. People feel that appointments are highly politicized, and people do not feel represented by their governments. Most people complain that they also have no avenues to complain about the lack of service delivery.

Livelihoods and Economy: In regard to livelihoods and the economy, in some parts of South Sudan the conflict has destroyed peoples' assets and livelihoods. On the other hand, there are claims that humanitarian assistance is strategically denied by governments, driving people into starvation. In Rubkona people complain about an absolute lack of economic and livelihood opportunities. Agricultural activities are dismissed as a possibility, as conflict fosters necessities for movements and makes the attendance of fields impossible. Respondents in Rubkona complain that the only livelihood opportunities are working with a humanitarian organization.

Access to services. At all levels consulted, county, payam and boma, people claimed that there was a significant lack of access to services. In Tonj County, for example, government representatives stated that there is limited access to basic services for the population. Some of the facilities are located far and therefore out of reach for many, especially due to poor road conditions during the rainy season. In Kapoeta State, government representatives explained that most services provided are humanitarian, including food distribution, health provision, education, protection and water and sanitation.

At the county level, for example in Tonj North County, services – such as health, education and water -are very limited and for some communities they are out of reach. The county has had a significant food shortage due to the flood in 2019 that destroyed or washed away crops. However, there is no food support to the communities. Road connections are bad, which makes some communities inaccessible for service delivery or makes it impossible for their residents to access services in the urban centers. Furthermore, the government has a lack of capacity and funds to provide services or extend their reach. As a result, some communities have migrated closer to water sources during the dry season.

In Kapoeta North County, there is also poor road infrastructure, which makes accessibility of service facilities difficult, especially during the rainy season. Even for county staff, mobility during the rainy season is difficult, and makes service supervision a difficult undertaking. There is a general lack of power in the County, as the solar batteries got spoiled and require replacement. This affects a variety of services.

At the payam level, respondents claimed that services are very limited. In one payam in Tonj North County, community members said that the school has a temporary structure, but many residents live too far for their children to be able to attend school. There are no health facilities at the payam level, which means often when pregnant women or children are rushed to the nearest health facilities, it is too late to save their lives. This is especially problematic during the rainy season.

At the Boma level, for example in Bomas in Tonj North, respondents explain that services are extremely limited, and that they have no food security, and a severe lack of funding. They have no school, no clean water, and the existing health facility is without any kind of medication. Most children do not attend school, because it is located too far away.

Role of government. The government in most areas sees its role mostly in the provision of security, as well as in the coordination of humanitarian aid. In Juba/Kapoeta State, for example, the government says it plays a role in the coordination of development actors, as well as in peace building activities. However, it has no development budget to implement any projects of its own.

The Payam Development Councils (PDCs) and Boma Development Councils (BDCs) largely still appear to be in place, however, their role is limited due to a shortage of funding. In Tonj State, their main role is coordination, and to ensure that development partners deliver quality services. They also help coordinate humanitarian services and support the payam administrator and boma chiefs in activities for the welfare of the communities. In Kapoeta North County, the PDCs and BDCs are relevant, but most of them are dormant since NGOs on the ground are said to not make use of them.

Land issues: consulted on potential land issues in regard to the projects, nearly all respondents stated that they do not anticipate any challenges. In Tonj North County, for example, the governmental said that chiefs usually liaise with the communities and provide land to any developmental or service delivery project. Respondents explained that land is easily accessible for development needs through the land committee, chiefs and the communities. In Kapoeta State, government officials explain that land is always available for any development program, and that the government and the communities need development. At the payam level, respondents explain that land ownership is communal, and it is easy to allocate land for development through consultations between payam, boma and the local communities. In another payam, respondents claim that relevant authorities from the county, payam and boma sit together and agree on land allocation. At the payam level a land committee exists, which coordinates with the communities should land be required for development.

Lessons from ECRP-I Implementation

Location targeting - administrative boundary complications: Problem: There was significant discrepancy between administrative boundaries as outlined by national government authorities and those understood by county officials and local communities. This created complications during entry activities when staff experiences on the ground did not match what was outlined in project design based on national government data. For ECRP II, it was determined that national, state, and county government officials,

with the project team to assist as a facilitator, should come together to mutually agree on a list of payams and bomas from each county - on which IOM could base its selection and interventions. Additionally, where there is disagreement between the county and national level, the project team should defer to counties' lists of administrative boundaries, while also keeping in mind that localities have and will continue to expand into many bomas to maximize resource delivery / development aid intervention.

Location targeting – selection in areas of wide-spread need: Even where boundaries have been established, ECRP staff were confronted by officials and community members who claimed that certain payams and bomas had been left out of ECRP benefits and were in equal need of assistance. This was an inevitable issue, as resources were not unlimited. However, this made the selection of target areas, as well as justifications regarding selection, extremely sensitive. When determining selected areas for ECRP II, discussions around expanding to new areas had to be approached with great thoughtfulness, and, where possible, efforts were made to include payams and bomas left out of ECRP I. Furthermore, those bomas that were merged were reviewed to determine whether it is sensible to keep them merged or to separate them under ECRP-II.

Development interventions in humanitarian context: It is often extremely difficult to explain development concepts to communities who are still in states of great humanitarian distress / with urgent humanitarian needs. As a result, priorities articulated often relate more to goods distributed under humanitarian assistance. Messages therefore need to be shaped to articulate the critical need for community development, particularly involving capacity building, even during a time of continued humanitarian context.

High expectations: The expectations of communities, when made aware that ECRP would be building infrastructure, was often far outside the scope of ECRP. Communities thus often became dismayed at the limitations placed on subprojects by eligibility criteria and budget, even when the scope of ECRP, eligibility criteria, and budget limitations were clearly conveyed from the start of entry activities. Messaging needed to emphasize that the ECRP is less an “infrastructure” project rather than a “local governance” project, whereby infrastructure was a means of capacity building towards the goal of stimulating community-based development, rather than an end in and of itself.

Sitting allowance/incentives: Continuous requests for sitting allowances and refusal to participate in project activities without compensation hampered the implementation of the project, including in regard to stakeholder engagement. While sitting allowance can sometimes serve as a helpful motivating factor for participation, it can also taint the authenticity of the commitment of project participants who may become more motivated by the allowance than participation for the sake of bettering their communities. ECRP recognized that sitting allowances were also a necessary ethical method for compensating communities for the time dedicated to livelihood activities that may have been lost to participants when participating in extensive workshops. Furthermore, sitting allowance would be particularly essential to provide to women who face risk of abuse at home if they fail to return without anything to show for their day(s) long absence. However, ECRP hinged on sustainability, meaning participants needed to be self-motivated to contribute to the development of their communities. Moving forward, ECRP-II explored additional options for in-kind contributions that served the dual role as incentives *and* as materials that facilitate PDC and BDC members to be able to do their jobs / participate in ECRP activities (meeting space / tukul, raincoats, gumboots, etc.). Additionally, capacity building activities of interest to the community, with an emphasis on the long-term benefit of these activities, can serve as incentives to participation. Finally, strategies to acknowledge the accomplishments of PDCs and BDCs served as motivation (provision of certificates to committee members, public recognition). Ultimately, there was expanded emphasis on

encouraging communities to be motivated primarily by their long-term vision of community development; this became an increasingly powerful as development initiatives began to bear fruit. Finally, the risk faced by women who did not receive substantive allowance needed greater attention; it was to include engaging directly with male community members to increase understanding of the purpose and importance of women's participation in community-development activities and to build attitudes of zero tolerance of abuse towards and violence against women overall.

Limitations of budget at payam level: The limited budget for infrastructure and the need for multiple bomas to agree upon infrastructure at the payam level at times led to disappointment and competition. These limitations / parameters also sometimes meant that certain bomas benefited less than others within their payam when the selected projects were not in or near their bomas. Messaging and managing expectations was essential. Facilitators were advised to place increased emphasis on the value of participatory processes and capacity building.

Instability / youth unrest: Security issues related to youth unrest in Renk and Pibor led to delays in project activities when all humanitarian and development partners had to depart the regions until the situation was resolved. Unrest stemmed from the youths' perceived marginalization from job opportunities in aid agencies. Under ECRP II, it was essential to expand the targeting and involvement of youth. This was done both by including them in employment opportunities (cash-for-work related to phase two infrastructure), DRM training and activities, and decision-making structures. While youth representatives were already elected to each BDC, it was important to consider how their participation in the BDC and in related activities, such as community O&M work and infrastructure oversight activities, would be enhanced during ECRP II.

Flooding: Exceptionally severe flooding in multiple regions of ECRP implementation, including in Rubkona, Leer, Pariang, Baliet, Fashoda, and Pibor, created frequent inaccessibility to target communities and to many project sites; flooding also prevented BDC and PDC members' ability to get to workshops and other ECRP activities. Flooding in Unity State, particularly in Rubkona, disrupted activities entirely and was preventing the construction of subprojects for the foreseeable future. For many flooded program areas, ECRP has been able to consistently monitor them and commence activities once the water dried enough to render the area accessible. The program schedule was modified accordingly and other activities in accessible regions were pursued in place of those on hold in the meantime to ensure maximum use of time.

Supporting meaningful inclusion of women: While women were involved in BDCs and PDCs in significant, largely equal, number due to ECRP requirements for BDC and PDC formation and quotas, ensuring meaningful participation was still challenging at times because of traditional norms that dissuade women from participating in decision making and because of practical issues that limited women's ability to comfortably attend workshops. Certain material items were to be provided to women to ensure their physical participation, including dignity kits / personal hygiene items, nearby space for breast feeding, and mats for children to sit, play, and rest on during workshops; the provision of these items proved immensely helpful. Addressing traditional norms that limit women's participation was more challenging. However, strategies that involve more frequent small group discussion during workshops whereby men and women are separated into different groups proved effective at giving women more of a voice in prioritization of subprojects. For example, women and men are separated for the pairwise ranking activity so that women can voice opinions more comfortably and, when scores from the men's and women's groups are combined, final prioritization has been equally influenced by men and women.

ECRP emphasis on inclusivity: As expected, traditional norms in many communities inhibit the meaningful and substantive inclusion of certain populations, most notably women, persons with disabilities, and youth. From the start, ECRP has placed heavy emphasis on inclusivity and the meaningful and substantive participation of all community groups; this begins on the second day of boma entry when community members divide themselves into socioeconomic groups and a representative is nominated for each group. This strategy has been effective, particularly for women and persons with disabilities. Overall, ECRP has witnessed notable shifts in attitudes within communities in favor of broader inclusivity. While much work is to be done, this experience has indicated that ECRP's focus on inclusive participation in community development has been impactful.

Transportation: Transportation proved to be an issue in some locations; participants involved in ECRP activities often expressed difficulty getting to the venue, with many having to travel long distances by foot, including through mud and rain during the rainy season. Even with ECRP's provision of travel allowance and best efforts to select the most central locations for workshops and meetings, participants still encountered difficulties related to transportation that are challenging for ECRP to address. Travel allowance was given to PDC members and county officials who often had to travel the longest distances for workshops, such as PPLs and county functionality assessments. Additionally, ECRP staff tried to select venues at the most central locations. In some circumstances where travel allowance truly proved to be insufficient, it was raised. In other circumstances, where feasible, IOM provided transportation for participants to the venue. These practices continued, but it was also worth exploring additional options, particularly where participants were still experiencing significant difficulties despite IOM's current efforts.

Further consultations were undertaken specifically in preparation for the ECRP-II:

High-Level Consultations

From November 8-20th, 2021, the World Bank met with representatives from the Ministry of Finance and Planning (MoFP), Local Government Board (LGB), Ministry of Gender, Child and Social Welfare (MGCSW), Ministry of Humanitarian Affairs and Disaster Management (MHADM), Relief and Rehabilitation Commission (RRC), development partners and NGOs engaged in local service delivery, community engagement, local conflict mitigation and disaster risk mitigation (DRM). The team also undertook a field trip to Malakal, Fashoda and Wau, where the team met with Governors, county governments, community members and Internally Displaced Persons (IDPs) along with field visits to ECRP-I sites.

The results of the meetings included agreements on key design elements for the ECRP-II, on the target counties, on the division of labor between the government and IOM, and on the required preparatory works related to procurement, fiduciary, and environmental and social safeguards.

Consultations with Refugee and Host Communities for ECRP II

IOM, with assistance from UNHCR and in coordination with the Government, undertook consultations with refugees and host communities in Maban County (Upper Nile State) and Jamjang (Parian County) in November 2021. Consultations included members of the refugee community and host communities, as well as NGOs and CSOs present in the area. The results are presented in the next section.

Key outcomes of consultations ECRP-I

National Level

Missions conducted with the national government mainly resulted in agreements over the scope of the project, in particular that it will address basic service delivery needs in vulnerable areas while

strengthening local institutions' service delivery capacity. The project's targeting of vulnerable areas particularly ones with a high concentration of returnees where demand for basic services and inter-communal social cohesion is high was endorsed. The mission also agreed on the following key features: (i) focus on gender (both gender empowerment and gender-based violence mitigation) and youth; (ii) focus on service delivery rather than the construction of infrastructure by leveraging other programs; (iii) put strong emphasis on operation and maintenance (O&M) to whatever extent possible on a cost-recovery basis using a successful public-private partnership model supported by the Netherlands; and (iv) the generation of cash-for-work opportunities to the extent possible.

Consultations with the government further resulted in a selection of geographic targeting principles. The team developed a vulnerability index which aggregates the following five indicators: (i) concentration of returnees; (ii) access to basic services; (iii) food insecurity; (iv) violence; and (v) accessibility. Vulnerability index-based targeting was agreed by the government as well as UNOPS and IOM. The mission explained that the vulnerability index will be updated based on latest datasets and the final selection of counties will be made early next year as the situation remains fluid. Once the list of possible target counties is determined by the vulnerability index, a more nuanced qualitative assessment will be undertaken to identify any "no go" areas that are too insecure or politically too sensitive. The government requested the team share the targeting results with the National Bureau of Statistics.

Agreements were made to finance "quick wins" to deliver tangible results quickly and help build the momentum of the project. The new long list for quick wins contains 7 states and 12 counties with a total of 149 subprojects worth US\$11 million. It was agreed that the final "quick wins" will be selected based on vulnerability and available budget. The combination of "quick wins" and vulnerable counties allows the project to benefit both stable and conflict-affected areas.

As for the relative emphasis of urban/rural areas, Bank-commissioned IOM population movement analysis found little correlation between urbanization and concentration of returnees. According to the study, about 87 percent of returnees go back to places of habitual residence in rural areas. It was thus agreed that the project will predominantly target rural areas.

Community-Level

Conflict and Peace: Community-level consultations have elaborated on a number of different issues. In Wau, for example, people were asked about their perceptions of peace. In this area people have heard about the peace agreements, but there is little trust that peace and its benefits will actually come. People feel that they as civilians are somewhat victimized by different factions. They also mistrust the peace, as they know that soldiers are 'still in the bush'. Their voices also reflect that there is little trust towards politicians, and that they are perceived to put their own interest first. People continue to feel unsafe, with local governments that cannot provide security to its citizens. This is closely connected with economic collapse and an absence of trust between communities. In Bor, for example, people even stated that they feel unsafe inside IDP camps.

Displacement: Furthermore, population movements and displacements are still of major concern in different areas. This is closely connected to deficiencies in government and service provision. In Wau, for example, the administration has little to no capacity to respond to the needs of IDPs and returnees, which leads to the increased relevance of humanitarian actors which diminishes the possibility for self-sufficiency. Government authorities, in turn, complain about the lack of resources. In Rubkona, prevailing insecurity and uncertainty makes IDPs remain in camp sites rather than return to their homes. In fact, families are spreading across different camp sites in order to minimize their risks.

Governments and even customary authorities in Rubkona feel that they have limited capacity to manage all the needs of the war-torn population. People feel that appointments are highly politicized and people do not feel represented by their governments. Most people complain that they also have no avenues to complain about the lack of service delivery.

Livelihoods and Economy: With regard to livelihoods and the economy, in some part of South Sudan the conflict has destroyed peoples' assets and livelihoods. On the other hand, there are claims that humanitarian assistance is strategically denied by governments, driving people into starvation. In Rubkona people complain about an absolute lack of economic and livelihood opportunities. Agricultural activities are dismissed as a possibility, as conflict fosters necessities for movements and makes the attendance of fields impossible. Respondents in Rubkona complain that the only livelihood opportunities are working with a humanitarian organization.

Access to services. At all levels consulted, county, payam and boma, people claimed that there was a significant lack of access to services. In Tonj North County, for example, government representatives stated that there is limited access to basic services for the population. Some of the facilities are located far and therefore out of reach for many, especially due to poor road conditions during the rainy season. In Kapoeta North County, government representatives explained that most services provided are humanitarian, including food distribution, health provision, education, protection and water and sanitation.

At the county level, for example in Tonj North County, services – such as health, education and water - are very limited and for some communities they are out of reach. The county has had a significant food shortage due to the flood in 2019 that destroyed or washed away crops. However, there is no food support to the communities. Road connections are bad, which makes some communities inaccessible for service delivery or makes it impossible for their residents to access services in the urban centers. Furthermore, the government has a lack of capacity and funds to provide services or extend their reach. As a result, some communities have migrated closer to water sources during the dry season.

In Kapoeta North County, there is also poor road infrastructure, which makes accessibility of service facilities difficult, especially during the rainy season. Even for county staff, mobility during the rainy season is difficult, and makes service supervision a difficult undertaking. There is a general lack of power in the County, as the solar batteries got spoiled and require replacement. This affects a variety of services.

At the payam level, respondents claimed that services are very limited. In one payam in Tonj North County, community members said that the school has a temporary structure, but many residents live too far for their children to be able to attend school. There are no health facilities at the payam level, which means often when pregnant women or children are rushed to the nearest health facilities, it is too late to save their lives. This is especially problematic during the rainy season.

At the Boma level, for example in Bomas in Tonj North, respondents explain that services are extremely limited, and that they have no food security, and a severe lack of funding. They have no school, no clean water, and the existing health facility is without any kind of medication. Most children do not attend school, because it is located too far away.

Role of government. The government in most areas sees its role mostly in the provision of security, as well as in the coordination of humanitarian aid. In Juba/Kapoeta State, for example, the government says it

plays a role in the coordination of development actors, as well as in peace building activities. However, it has no development budget to implement any projects of its own.

The PDCs and BDCs largely still appear to be in place, however, their role is limited due to a shortage of funding. In Tonj State, their main role is coordination, and to ensure that development partners deliver quality services. They also help coordinate humanitarian services, and support the payam administrator and boma chiefs in activities for the welfare of the communities. In Kapoeta North County, the PDCs and BDCs are relevant, but most of them are dormant since NGOs on the ground are said to not make use of them.

Land issues: consulted on potential land issues regarding the projects, nearly all respondents stated that they do not anticipate any challenges. In Tonj North County, for example, the governmental said that chiefs usually liaise with the communities and provide land to any developmental or service delivery project. Respondents explained that land is easily accessible for development needs through the land committee, chiefs and the communities. In Kapoeta State, government officials explain that land is always available for any development program, and that the government and the communities need development. At the payam level, respondents explain that land ownership is communal, and it is easy to allocate land for development through consultations between payam, boma and the local communities. In another payam, respondents claim that relevant authorities from the county, payam and boma sit together and agree on land allocation. At the payam level a land committee exists, which coordinates with the communities should land be required for development.

Key outcomes of consultations ECRP-II

Host Communities

PDCs/BDCs: Host community members stated that the BDC are representative of the Boma, as members were selected from different villages. Recommendations were made to improve coordination and cooperation with the BDC. Communities articulated that it is important for the Chiefs to be involved in Boma meetings, including BDCs, as they also represent the community.

Dwellings: The group described the typical dwellings within the Boma to be thatched roof houses. These are constructed with grass and sticks and then coated with mud (two layers for insulation) and sometimes plastic sheeting. Typically, dwellings have one room and the whole family (up to 5 or 6 children plus parents) sleep in this room. The host community members gave a range of household sizes, stating that there is not a typical size of family. The reason given for the size of families was young marriage which leads to a wide age range of children within one household.

Water: available water is not sufficient for the whole community, for example, 1 borehole is accessed by 142 households, and it is very overcrowded. Within the host community specifically, requests for assistance tend to focus on water.

Health: There is no clinic in the consulted Boma or nearby. The nearest clinic is located in the county headquarters, where the county health hospital is located, there is need for a broader availability of health services.

Education: Schooling in the consulted areas is not completely functional. The schools are operational (offering classes for P1-P5), but several respondents expressed that they felt the students are not progressing. There are teachers, but the community are not sure if they are trained. Only 12 out of the 22 respondents, for example, agreed that their children are attending school regularly. For those whose children are not attending regularly the reason given was lack of qualified teachers and therefore lack of quality teaching. The consulted group requested support with adult education classes, as seen in refugee settings.

Food Security: The consulted group described that the arrival of the refugees has changed their access to food. Before the refugees arrived in the area, they were secure going to the farming areas. But after refugees arrived, there have been security issues, for example in sorghum planting areas there were attacks and food was stolen and so they used to have to go in groups for safety. It was stated that since Peace Committees were set up, a lot of meetings were held between the host and refugee communities and the tensions reduced. They are now able to travel to farm alone, but food is still scarce as what they produce is not enough to feed everyone fully.

Violence: Violence mostly occurs at the family or inside the household. Domestic abuse is usually arbitrated by the elders within the family. If one family is fighting, the Chief is often called to help resolve the issue.

Social Cohesion: The consulted communities agreed that there are no groups or committees in the community, and the reason given is that they concentrate more on farming because they have to access food. In Jamjam the community representatives include the County Commissioner, Executive Director, Youth Committee, Women Committee, Dialogues Committee, and Local Government Committee.

Humanitarian Assistance: In the consulted host community, food distributions are implemented by ACTED and Samaritan's Purse, funded by WFP. Community members go to the nearest town to receive them. There was also some training provided by FAO on crop growing and seeds were given out, but the seeds are not producing (which community members think is due to using manual methods and not cultivation using a tractor). The primary school is supported by WFP for school-feeding and Save the Children for school materials. Most of the teachers are volunteer teachers.

Refugee Communities:

Refugees consulted stated that their camps were set up 10 years ago, in 2011, and most participants moved to the camps of Gendrassa and Batil between September 2011 and 2012 with the variance described as being due to the repatriation schedule and as a result of the conflicts in Blue Nile around 2011. All participants originally came from the Blue Nile and most came via Jamam, where they first arrived and then were moved into the refugee camps once set up. Most participants came with their families, but also explained that some refugees left their families in Blue Nile and came alone, some even as unaccompanied children. In the Paamir Camp the refugee community has been in this area for five years from the Nubia mountains.

Administration and Governance: Within the camps a number of sector-specific committees exist. The Camp Executive Committee liaises with the Payam Administrator from the host community and if needed, he will link them with the County Commissioner/County government.

The camps in Maban have a political and military leaderships. These don't have linkages with UNHCR or other development actors but are a reality on the ground that need to be understood/actors need to be aware of. They liaise directly with the County government and other leadership structures within the Upper Nile. In Jamjam, the refugee communities are represented by the Executive Committee or Refugee Council, Community Watch Group, Women's group, Elderly Person Committee, Culture and Art Committee, and Health Committee.

Humanitarian support: Support includes a variety of sectors: WASH – through ACTED, who is also camp manager; Health – through Relief International; Ministry of Health (vaccinations with support from Relief International); Food rations - provided by WFP (vegetables, cereals and cooking oil); Child protection – Save The Children; General protection – HDC and UNHCR; Education – LWF (primary and secondary schooling) and JRS (teacher training); DABI (scholarships for university level education); Agriculture and livelihoods – Relief International (income support activities and grants for small business e.g. planting trees) and FAO (seed distribution); General coordination – Government of South Sudan, UNHCR, ACTED; Shelter – ACTED; Veterinary services – FAO; Family reunification – Red Cross; Psychosocial Support – JRS; Mentoring and training – Mentoring Initiative.

In Jamjam, DRC provides camp management services, NFIs, and livelihood activities. IRC provides health services in Paamir camp, GBV provision, agriculture activities, especially economic recovery development, and WASH services. LWF provides education and child protection services. AAHI provides logistic, construction, and road maintenance services. AHA provides health services in the Ajuong Thok camp. Samaritans Purse / WFP – General food distribution in both camps.

Food security – WFP is the only organization providing food, and this year it has seen a 50-70% cut in funding and therefore food supply. In terms of food security, there are sustainable ways that refugees can do some of this for themselves and this is currently being done through Relief International and WFP is considering support in this area. FAO sometimes supports with agricultural inputs, but more can still be done through infrastructure to improve land tillage systems to make food security more sustainable.

Economic Activities: Refugees claimed to receive support from Relief International for small business development at the household level, where households are given 5 goats as a starter, but the coverage of the camps is not complete and the criteria for selecting participants for this and other activities is high and there is a general feeling that those selected then do not have the skills needed to manage the business well.

The respondents gave some suggestions of other types of training or support for economic activities that would be useful, included tailoring training for women and youth to build skills and make items to sell (such as face masks or school uniforms, which are often in short supply and brought in from Juba). There are tailoring courses available in the camps, but they are not sufficient. Women also suggested assistance with soap-making, as at the moment this is made on a small scale and sold, but the camps themselves buy soap from Juba or Khartoum. Respondents suggested this could be done by the community as an economic activity.

Farming is also a major economic activity for the refugee communities. They have been given land around the camps to grow and cultivate crops, but the seeds distributed are being delivered late, which means they are not able to make the most of the seasons. There is also a need for tools. Farming activities have also been jeopardized by flooding.

Violence: Respondents agreed that awareness regarding domestic violence has helped decrease cases. Income was cited as a major trigger for domestic violence – most roles and activities within the camps are on a voluntary basis and a lack of income creates problems at the domestic level. More broadly, they claimed that there are few incidents of violence at the wider community level and the Peace Committees have helped to reduce incidents.

Social Cohesion: In addition to sector-specific camp committees and peace committees, there is a women's committee, which runs activities such as bead-making, crochet and crafts as well as supporting information sharing and awareness raising around topics such as domestic violence and gender equality. Any issues that come up and they cannot support are escalated to the relevant parties such as protection partners. The camps have a number of committees and structures that represent specific areas and also a Camp Executive Committee. Refugees also feel well-represented by Chiefs and camp leaders/chairpersons. They also explained that at any presentations or meetings, representatives of women and youth are also present across the camps.

In Jamjam, the activities that bring the community together include a monthly peace dialogue and youth sports tournament, which has promoted peace and coexistence. Youth cultural festivals and international day events also bring the community together.

Basic Services: Generally, refugees consulted felt that the levels of provision and access to basic services was good, within both camps and appreciation for the partners supporting the camps was expressed. However, there are still numerous gaps to be filled.

Health – While basic health services are available, they are largely run by nurses, not doctors. There is a need to increase the number of wards in the clinics. There is also need for power supplies to the clinics to help with running fans or a/c in the dry season as the clinics can be very hot. More can be done in terms of ensuring consistent supplies of some key drugs and sometime drugs that are less commonly needed expire without being used. The hospital could use support to be upgraded to acting as a bigger referral hospital. The most frequently cited request for community infrastructure are health facilities, including new construction and expansion of wards to accommodate the number of patients.

Education – Access to education was generally described as good, particularly at the primary level. Many children are progressing into secondary schools, but the challenges are with tertiary education, as there are very limited opportunities for attending university or further education due to lack of resources and limited scholarships. There are not a lot of vocational training opportunities, aside from teacher training, and it was commented that most completing secondary education end up as teachers or incentive workers. One priority that was mentioned was more classrooms within the schools to better accommodate the learners would help with access to education as currently class numbers are very high within one classroom.

WASH – The WASH standards were described as good, but more can still be done (the focus within the camps is more on maintenance than new construction), sustainable or clean sources for WASH, and solar power.

Communication – internet and communication services were mentioned as a service that is severely lacking within the camps (there is no phone network in the area). The respondents explained that this makes it difficult to stay connected to family and also to follow up on community members taken to the nearest hospital.

Shelter – the group felt that the chances of returning to their places of origin are low due to ongoing instability in the region. In which case, they would prefer to have more permanent shelters for families. They buy poles for making shelters currently from the host community (as well as firewood) but the locations are far away and flooding affects access.

Flood Risks: The biggest request coming from one of the refugee communities is a bridge across Yabus River. This could assist all the communities in a unique way – it will serve as a flood mitigation measure, support agricultural activities for mainly host community and also offers a sanctuary for communities needing to vacate flooded areas as they can more easily access higher ground. The communities don't want to relocate permanently from areas prone to flooding, they just want to reach higher ground during floods and return once the water has reduced. There is also fertile land on the other side of the river, which offers soil for brick making, access to trees/forest and can aid better communication between Payams.

General

Further activities that could benefit both host and refugee community could be:

- Boreholes with solar panels to assist horticultural activities and nutrition gaps through growing of more vegetables (generally speaking a typical diet is meats and starch). This has been successful previously and could help both host community and refugee community together.
- Extension of road from Doro camp to host community (approximately 5km marram road).
- Common markets – these are used by both host and refugee committees and provide a space and activity that brings them together. For example, Bunj market is accessed and used by both host and refugee committees and the host community go to markets in Batil around the camp.
- Common services – there are some shared agricultural areas (fields) and shared WASH facilities. There are also host and refugee community members using the same health facilities and schools. For example, the secondary school and hospital in Bunj are attended by refugees and host community also accesses some health facilities in or near the camps.
- The main risks include contributing to tension between refugees and host communities. Mitigation measures could consist of an inclusive prioritization process involving community groups and ensuring that the selected infrastructure is accessible to all populations.

Relations with Host Communities: The relationship between refugees and the host communities are generally described as good. They are assisted by Peace Committees, which are made up of members from the host and refugee communities and they engage in a number of joint activities, such as joint peace campaigns/tours where they visit the host community together to spread messages about peaceful coexistence and the group felt that such activities had helped a lot.

There is also a joint court made up of both communities, and any issues or crimes that arise can be taken to the joint court to be resolved and dealt with. The court building is outside the camp.

Inclusion: The biggest risk is if one or more Bomas or Payams are excluded from project benefits, as this can be seen as political and those that have been excluded would perhaps try to stop work in areas that are included. If there are areas where work cannot take place, the community leadership needs to be involved in this decision.

Operations and maintenance: Respondents pointed out, that there needs to be a strong plan on how infrastructure can be run, maintained, or serviced. Sometimes good infrastructure becomes a white elephant because it cannot be maintained.

Security: The area of Maban sometimes faces instability, which may lead to the interruption of work by the seasonal violence that has characterized this area for some time (not necessarily targeting the infrastructure or the project, just general instability). The main mitigation measure would be through the County leadership, and it should be noted that the current County Commissioner has been effective in calming tensions. There are no known or obvious existing tensions presently but now and then there are isolated incidents triggered by specific events, for example incidents of rape within a firewood collection area or a fight at a local drinking place where someone is killed or injured. Individual security incidents trigger tensions, which are normally referred to and resolved by the joint Peace Committees. In the past there have been more widespread tensions, for example sometimes refugees might plow in new areas that are owned by the Host community which would cause issues, but now it is more individual incidents that are generally resolved. Generally, the host community now feels that the refugee presence in Maban is mutually beneficial in terms of services being brought to the area and the business brought by refugees in trade/selling of goods.

Land: Land ownership is based on the land tenure system in South Sudan, whereby land is owned by the local communities, therefore ease of access or use depends on the negotiations that are done. There are no title deeds or formal documentation, it is a negotiation process, and it is unique to each community. Land is available but generally the community needs to understand the use and potential benefit for them, for example the negotiation might allow that they will eventually be the owners of the infrastructure or there would be a clear understanding of how their children will benefit. Generally, the community and the Local Leaders easily donate land for establishing facilities of public goods (school, health, boreholes, markets etc.). The project has developed a template for land donation which is usually used to formalize the land ownership though this is only signed at the Boma and/or Payam Levels.

4. Legislative and Policy Requirements

The South Sudan Access to Information Act No. 65 of 2013 spells out that every citizen shall have the right of access to information. It focuses on the right to access information held by public bodies in South Sudan. The purpose of the Act is to give effect to the constitutional right of access to information, promote maximum disclosure of information in the public interest and establish effective mechanisms to secure that right.

The Environment Policy of South Sudan, from 2016, provides guidelines for a wide range of responses to environmental management. These include the promotion of effective, widespread, and public participation in the conservation and management of the environment.

The World Bank's ESS 10 sets out that a borrower has to engage with stakeholders as an integral part of a project's environmental and social assessment and project design and implementation. The nature, scope and frequency of the engagement should be proportional to the nature and scale of the project. Consultations with stakeholders have to be meaningful and be based on stakeholder identification and analysis, plans on how to engage stakeholders, disclosure of information, actual consultations, as well as responses to stakeholder grievances and reporting back to stakeholders.¹

Key objectives of ESS10 are the establishment of a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship; assessment of the level of stakeholder interest and support for the project and for the integration of stakeholders' views in design and understanding of E&S risks and impacts; provision of effective and inclusive engagement with project-affected persons throughout the project lifespan; disclosure of project information on E&S social risks and impacts; and provision of accessible and inclusive means to file grievances for project-affected persons.

ESS10 prescribes the identification and analysis of stakeholders as the first step in the engagement of stakeholder during project preparation. The Borrower is called to identify different stakeholders, including project-affected parties, as well as interested parties. In particular, the Borrower has to identify stakeholder groups that are vulnerable or disadvantaged. In the stakeholder engagement plan, the Borrower will lay out timings and methods of the engagement with the different stakeholder groups that have been identified.

¹ World Bank, Environmental and Social Framework. Setting Environmental and Social Standards for Investment Project Financing, August 2016.

5. Stakeholder Identification and Analysis

ECRP-II benefits vulnerable counties in South Sudan including the most vulnerable people such as IDPs and refugees. While not every affected party will also be a beneficiary, it is crucial to disseminate information and engage with all stakeholders on project modalities as well as on the selection criteria of beneficiaries. Stakeholders are categorized generally as ‘project-affected’ parties or those that may have an interest in the project, which will be identified as ‘other interested’ parties.

Furthermore, it is important that all processes of information disclosure and consultation are as inclusive as possible to ensure that all sections of the affected communities will benefit from the project, and women, youth, refugees and other vulnerable groups are not excluded.

5.1 Ethnic Groups and Community Structures and Organizations

South Sudan became independent from Sudan in 2011, following protracted war with the neighbor country. However, in 2013 additional civil war among internal factions – along ethnic and clan lines - left the country shattered. In September 2018 a peace agreement was signed between the warring factions.

South Sudan consists of a broad variety of ethno-linguistic groups. Those entail three sub-categories of speakers of the Nilo-Saharan language family: speakers of *West Nilotic* languages (Dinka, Nuer, Atuot); speakers of *Western Nilotic / Luo* languages (Shilluk, Anuak, Maban in Upper Nile and Ethiopian borderlands; Acholi in Eastern Equatoria; and Jur-Luo in Western Bahr el-Ghazal); and speakers of *Eastern Nilotic* languages (Eastern and Central Equatoria: Bari, Lotuho and Teso). Furthermore, there are speakers of the *Niger-Congo* language family, including the Zande in Western Equatoria.²

However, it is important to understand that ethnic groups can be heterogeneous. As different experiences in the recent civil war have shown, those differences can even occur in the same localities. Many of the recent clashes have taken place in an intra-ethnic manner, such as among Nuer clans in Unity State.

Furthermore, some of the ethnic groups above are smaller in number or have less political influence at the central level. Most importantly, however, at the local level, some may form majorities in some of the counties, while they are minorities in others. It hence needs to be determined in each specific context which group constitutes an ‘ethnic minority’.

Different groups also adhere to different types of social structure.

² Joseph H. Greenberg (ed), *Universals of Human Language*, Cambridge Mass. MIT Press, 1963

For pastoralists, such as the Nilotic Dinka, Nuer and Atuot the search for pasture shapes most of their socio-cultural life. They may migrate from homesteads on high grounds in the wet season to mobile cattle camps on the dried-out swamps in the dry season. Closely linked to this lifestyle is a social structure, which gives preference to an ‘acephalous’ (‘headless’) socio-political organization rather than a central authority. Similarly, systems of exchange are based on social connections established through marriage rather than open markets.³

Farming communities, on the other hand, present a settled lifestyle. This usually goes along with central authority and/or hierarchical leadership structure, such as kingdoms or provincial chiefs (the latter were often instated by foreign rulers). For example, early accounts of the Zande kingdom around Yambio showed state-like elements, such as tribute paying, taxation or the death penalty. Both, the Shilluk and Anuak (Luo speakers) had systems of sacral kingship, which differed from the secular authoritarianism of the Zande state.

In many cases ‘traditional’ authorities were invented or established by outsiders in order to act as intermediaries for taxation, labor mobilization, and other forms of coercion. This was especially instrumental vis-à-vis the acephalous societies, as they were otherwise difficult to engage with or to rule over. This means that there needs to be a careful contextual analysis before entering a new area to create understanding about the actual representativeness of ‘traditional authorities’ for a community. Alongside these instated authorities existed other and older forms of authorities, which were based on local concepts of origin, power and authority.⁴ Many of the different forms of social structures in South Sudan are therefore based on the kinship concepts of a ‘segment’ or a lineage. Wealth is still a major marker in the social strata and the size of cattle herds – among the pastoralist societies - is a significant indicator for wealth.

‘Civil society’, however, is a difficult term in South Sudan, as most people belong to communities defined by lineages. Markets, on the other hand are poorly developed and most societies have been militarized so that distinctions between civilian and combatant young men are difficult. Literature mostly treats ‘civil society’ as organizations that are dependent on foreign resources and deploying foreign rhetoric of rights and development.⁵

After a general agreement in the 2005 Comprehensive Peace Agreement (CPA) that governance in South Sudan needs to be decentralized, the 2009 Local Government Act decentralized and devolved decision-making powers from the national level to the states, to county and sub-county (payam) levels and to bomas. County commissioners and county legislative councils are elected representatives. Participation at the county level in decision-making fora must therefore be as inclusive as possible, representing the different interest groups at the payam level. At the county level citizens’ development committees are formed for this reason.⁶ However, since 2011 many powers have been moved back to the central level in order to create a strong executive government model. Furthermore, the states also exercise a significant amount of power as they appoint state governors and control resources.⁷

³ Naomi Pendle, Marco Pfister, Martina Satschi, Mareike Schomerus, Danielle Stein, Eddie Thomas, Craig Valters, Local Socio-Political Organization and Implications for Community-Driven Development in South Sudan An Analysis of Existing Literature, prepared for the World Bank, unpublished, 2012, p. 14.

⁴ Pendle et al, 2012, p. 15.

⁵ Pendle et al, 2012, p. 25.

⁶ Iffat Idris, Local governance in South Sudan: an overview, K4D Helpdesk Report, November 2017, p.2

⁷ Iffat Idris, Local governance in South Sudan: an overview, K4D Helpdesk Report, November 2017, p.2

Traditional authorities, in their various forms, have been integrated into local governance structures in order to improve service delivery, access to justice and eradicate poverty. The Local Governance Act deals with the distribution of powers between county, payam and traditional leaders. Chiefs can be elected conventionally or according to traditional practice. However, in addition to the fact that many traditional authorities historically had been appointed and empowered by outside sources, their power was further eroded in the recent civil war. Massive displacement of populations saw new chiefs emerging, factions of the conflict appointed their own chiefs, and existing traditional chiefs often had to side with the dominant political and militant groups in a given area.⁸

Other organizations outside of the government structures exist. These associations can include women's groups, youth, or ethnicity-based urban groups, providing support systems for rural – urban migrants. However, especially youth groups can also turn into militant organizations at times. Town politicians can mobilize rural constituencies around ethnicities of clan lines for support.⁹ This is repeated at the national level, where there are general fears of domination of Dinka and Nuer influence in government.

Through the preceding Local Governance and Service Delivery Project (LGSDP) and the ECRP, Boma and Payam Development Committees (BDC and PDC) were set up, these councils are inclusive and ensure representation of local vulnerable groups. The councils are currently further developed and strengthened throughout the ECRP-II and play a key role in activities, including in community consultations.

⁸ Iffat Idris, Local governance in South Sudan: an overview, K4D Helpdesk Report, November 2017, p.3

⁹ Pendle et al, 2012, p. 25

5.2 Stakeholder Analysis Matrix

Table 1: Stakeholder Analysis Matrix

Affected Group	Stakeholder	Component	Remarks / Analysis contributing to better understanding of the different groups of stakeholders
Project-affected parties			
Community members	Women and girls	C1/C2/C3	Women and girls in South Sudan suffer from significant discrimination, including in education, economic empowerment and public participation, and are subject to widespread GBV, including domestic violence, gang rape and other abuses.
	Vulnerable households	C1/C2/C3	There are a variety of vulnerable households, including female-headed households, households headed by persons with disabilities, and households headed by children. Such households are both less able to participate in engagement but are also at greater risk of being excluded from Project benefits.
	Widows	C1/C2/C3	The conflict in South Sudan had resulted in the deaths of thousands of people and has had a devastating effect on many families. Widows in particular are often marginalized and vulnerable in host communities as well as among the IDP and returnee populations.
	Youth	C1/C2/C3	Youth is a big demographic in the country but given opportunities, they could contribute significantly to stability and economic prosperity. The Sudanese military as well as other armed groups have regularly recruited large numbers of boys as child soldiers and girls to perform sexual and domestic services for armed combatants.
	Returnees / IDPs	C1/C2/C3	Due to the internal conflict in the country many people fled the country for security reason and will likely return as soon as stability and security is restored. Demand for basic services is paramount. Among returnees are persons who have suffered disabilities as a result of the conflict.
	Refugees	C1/C2/C3	The vast majority – some 95 percent – of refugees in Jamjang and Maban reside in camps administered by UNHCR through humanitarian response partners. Due to significant limitations on government capacity, UNHCR and its partners provide nearly all of their needs. Robust engagement needs to be ensured. However, consultations have shown that refugees may have more access to basic services than host communities.
	Host Communities	C1/C2/C3	There is significant social and economic impact of refugee displacement on host communities and refugees. Host communities are often affected and have been recipients of UNHCR humanitarian responses as well.

	Ethnic minority groups	C1/C2/C3	Some of these groups have suffered historic discrimination and economic and political marginalization and also more recently, the brunt of the conflict. They will need special attention.
	People with disabilities	C1/C2/C3	There are a significant number of persons with disabilities, including those injured during conflict.
	General community members	C1//C2/C3	Demand for public awareness and services to members of community will be high when the government of national unity is formed.
	Potential community workers	C1/C2/C3	Within the communities, some individuals with some level of education exist, but not enough to take up jobs in the cities. Therefore, they are important resources that could be used. The project will need to sensitively manage expectations among affected communities in relation to the actual numbers of persons who can be hired to work for the project.
	Local religious leaders	C1/C2/C3	They often have substantial moral and other authority in their communities
National and State Governments	MoFP and LG Board	C1/C2/C3/C4	Borrower/Implementer
Local Government	Traditional leadership	C1/C2/C3	They are important and need to be engaged in community meetings and consultations.
	Local leadership	C1/C2/C3	Need to be engaged in community consultation and the endorsement of community decisions.
	County government (county governor and other county staff)	C1/C2/C3	Under the Local Governance Act (LGA), responsibility for service delivery is devolved to the county/city level.
	Members of the BDCs and PDCs	C1/C2/C3	The LGA and its implementation guidelines prescribe the role and composition of <i>Boma</i> Development Committees (BDCs) and <i>Payam</i> Development Committees (PDCs) as semi-formal community institutions responsible for supporting the planning and implementation of local development initiatives.
	Members of the city/town, block and quarter councils	C1/C2/C3	Local government entities in urban areas.
CSOs and NGOs	Local CSOs and NGOs as per State / county	C1/C2/C3	NGOs and CSOs have formed around the aid funding that has been made available in many areas of South Sudan. Often NGOs provide key services, and also provide key opportunities for employment in some areas. However, the capacity of most NGOs to deliver high quality services is often small. Key NGOs in the project areas include the Norwegian Refugee Council (NRC) working on camp management, education, livelihoods, WASH and resettlement; the International Federation of the Red Cross (IFRC) working on disaster, climate and crisis, protection and engagement; or the REACH Initiative working on research and data collection, World Vision, and others. Key local NGOs representing groups relevant for this project include the Women Resilience and Development Agency (WORADA) addressing gender equality and women's empowerment issues; the Women and Children Foundation (WCF)

			with a holistic focus on women's and children's needs; the Christian Restore Hope in South Sudan fighting poverty and social injustice; Agriculture Transformation and Rural Development (ATARD) promoting rural development; and others.
Development Partners	World Bank	C1/C2/C3/C4	Donor
	IOM and other IPs	C1/C2/C3	IP
Interested Parties			
Development Partners (International Organizations, INGOs, Donors)	Other UN agencies and entities (UNMISS, UNICEF, UNFPA, UNDP, FAO, UNEP)	C1/C2/C3/C4	All organisations working in project locations are stakeholders and close coordination would add value.
	International NGOs operating in the relevant sectors (health, education)	C1/C2/C3/C4	Support services in the constructed infrastructure.
Business Community	Local Business and Construction Companies	C1/C2/C3	Local companies that may be resources for construction work.
Steering Committee (national level)	Ministry of Water	C1/C2/C3/C4	Member of Steering Committee
	Ministry of Health	C1/C2/C3/C4	Member of Steering Committee
	Ministry of Education	C1/C2/C3/C4	Member of Steering Committee
	Ministry of Finance and Planning (MoFP)	C1/C2/C3/C4	Chair of Steering Committee
	Ministry of Gender, Child and Social Welfare (MoGCSW)	C1/C2/C3/C4	Member of Steering Committee
	Local Government Board (LGB)	C1/C2/C3	Member of Steering Committee
	Relief and Rehabilitation Commission (RRC) under the Ministry of Humanitarian Affairs		Member of Steering Committee
	Ministry of Federal Affairs	C1/C2/C3/C4	Member of Steering Committee
County Coordination Committee	County Commissioners	C1/C2/C3	Member of County Coordination Committee
	County Planning Officers	C1/C2/C3	Member of County Coordination Committee

5.3 Disadvantaged / Vulnerable Individuals and Groups

Table 2: Vulnerable Individuals and groups

Disadvantaged / Vulnerable Group	Remarks
Women	<p>Women and girls are typically left out of decision-making processes and political representation, leading to local and community-based decisions that do not account for their unique needs and capacities. This produces a ripple effect on labor or economic opportunities, risks of GBV and educational opportunities.</p> <p>While the 2009 Land Act provides equal access and rights to land tenure for both men and women, customary justice outcomes indicate that women are consistently blocked from securing and owning property.¹⁰</p> <p>Women are targeted for sexual assault, either in military raids or by intimate partners. About 65% of women in South Sudan have been victims of physical and sexual violence. The risk of sexual violence negatively affects women's ability to access income and resources.</p> <p>Conflict has severely affected women and girls' access to services. In particular, access to education, WASH and health services, including sexual and reproductive health, has decreased to even lower levels.</p>
Girls	<p>Girls are often excluded from educational opportunities based on gender norms dictating girls' domestic and caretaking responsibilities along with prospects for early marriage.</p> <p>Girls under 18 are also targeted as victims of sexual violence and UNICEF reports that the majority of women experience GBV for the first time when they are children.¹¹</p> <p>The conflict has exacerbated the practice of bride price. Selling young girls for marriage is a coping strategy for families in times of economic hardship. Sexual abuse and early marriage also make them vulnerable to early pregnancy.</p> <p>Girls are also vulnerable to be traded for prostitution.</p>
Youth	<p>Years of conflict have provided distinct motivations for youth and their livelihood choices, including engagement in conflict and violence.¹² 30 per cent of young people between the ages of 15 and 35 identify themselves as currently 'inactive' – neither engaged in education nor economic activities.</p>

¹⁰ Shelter NFI Cluster South Sudan (2017) "Key Housing, Land and Property (HLP) Issues in Urban Areas of South Sudan".

¹¹ UNICEF, 2018.

¹² Roz Price and Anna Ornert, Youth in South Sudan: livelihoods and conflict, K4D, 2017, p.2.

	Young people have largely been excluded from political life, including through the age-based systems of authority that prevails in some parts of South Sudan. 'Age sets' are an important socio-cultural feature which denote formalized community groups in which members are of the same age.
Women-headed households	<p>Up to 80 percent of displaced households are female-headed.</p> <p>For displaced widows returning to their homes of origin, the lack of documentation and rights for women to use and own property pose substantial threats to their safety and security.</p> <p>Women suffer greater food insecurity due to their cultural and social roles as caregivers and they may forego or pass on food within families, especially in female-headed households.</p>
Child-headed households	UNHCR reports high levels of refugee families headed by children reaching refugee camps in Uganda. These children have become responsible for themselves and their siblings after their family members were killed or torn apart due to economic hardship and conflict. Lack of specific attention to these households exposes children to illness, rape and forced recruitment into slavery or armed groups. Initiatives such as the creation of foster banks, reunification of families and cash programmes need to be explored to meet the needs of this specific vulnerable group.
Children	<p>Displacement and conflict have resulted in high levels of family separation and up to 9,700 cases of unaccompanied, separated and missing children.¹³ These children are extremely vulnerable to violence and abuse.</p> <p>Children also face psychological distress: about 1 million children are estimated to require psychosocial support as a result of witnessing killings, destruction of homes and loss of family members and friends.</p>
Minority Ethnic Groups	The ECRP will work in areas that are both government and opposition-controlled, conflict-affected or have significant minority populations. Ethnic minorities may occur at different levels, in the state or even inside the county. Here they may be dominated by authorities from other groups and may have little decision-making power (see section above).
Disabled Persons	<p>South Sudan has a National Disability and Inclusion Policy (2013). According to the last census in 2008/2009 there was a prevalence rate of disability in South Sudan of 5.1%. The disability assessment (2019) indicates that physical impairments represent between 35% and 52%, vision impairment between 20% and 33%, hearing impairment between 12% and 15% and intellectual and mental illness between 10% and 17%. The main challenges faced by people with disabilities are access to basic services and discrimination that hinders their participation in social, political and economic life.</p> <p>Women with disabilities experience higher levels of physical, psychological and sexual violence.</p> <p>Elders with disabilities face greater challenges due to less access to food, wash facilities and other support.</p>
IDPs	The conflicts in South Sudan have led to significant displacement of populations. Since 2013, over 1.9 million people (53.4 percent children) have been internally displaced in South Sudan. An additional 2.1 million have left the country as refugees. ¹⁴ Almost 90 per cent of IDPs are women and children.
Returnees	IDPs and refugees are more likely to return to areas within or near their villages of origin. Given this pattern, most returnees are likely to be concentrated in rural and peri-urban areas where they remain vulnerable to shocks induced by climate volatility, administrative mismanagement and ongoing conflict due to increasing competition over resources, housing and access to basic services.

¹³ Child Protection, Sub-Cluster Strategy, South Sudan

¹⁴ UNICEF, Education, South Sudan Country Office, December 2019, p. 1.

	Women on the move report that the most salient challenges they face are: SGBV, access to housing, land and property as well as extremely scarce resources.
Refugees	Although South Sudan has more than 2.3 million refugees abroad and over 1.7 million IDPs, it also hosts some 320,000 refugees. The vast majority – roughly 95 percent – are Sudanese refugees living in the northernmost parts of South Sudan, in Jamjang County in the Ruweng Administrative Area and Maban County in Upper Nile State, while Pochalla in Pibor Administrative Area also hosts some. South Sudan also hosts refugees from DRC, CAR, Ethiopia, and Eritrea, primarily in Western Equatoria and Central Equatoria
Host Communities	Host communities often already live in areas where access to services is scarce. Sharing those with refugee populations can have significant negative impacts on host communities. In the above-named refugee areas, refugees significantly outnumber host communities. Nearly all refugees live in camps administered by UNHCR, where they depend almost entirely on humanitarian assistance for survival. Conditions are often worse for host communities. Hosting areas in the north are highly isolated and exposed to natural disasters. In some areas, the inflow of refugees brought a surge in humanitarian assistance, and humanitarian actors have sought to include host communities in their services to the extent resources allow. Still, the living conditions and socioeconomic vulnerability of host communities are typically even more dire than the refugees they host. A decline in humanitarian assistance is predicted in the coming years, it will exacerbate the already significant development deficits facing refugees and their hosts.

Important to note is that intersectionality can further promote vulnerability, for example where women are also IDPs or returnees; where members of minority ethnic groups are IDPs or returnees; or where youth are IDPs.

5.4 Summary of Project Stakeholder Needs

Table 3: Project Stakeholder Needs

Community	Stakeholder Group	Key Characteristics	Language requirements	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings etc.)
National Level¹⁵	Ministries involved in the Steering Committee of the Project (Ministry of Finance & Planning, Local Government Board, Ministry of Humanitarian Affairs and Disaster Management, Ministry of Gender, Child and Welfare)	Potentially Influencing Party	English	Memo/letter, email, telephone calls	Meetings on at least semi-annual basis, hand-outs.
	Other related Ministries that have an interest in the Project (Ministries of General Education, Health, Water Resources)	Interested Party	English	Memo/letter, email, telephone calls	Meetings on at least semi-annual basis, hand-outs.
	IOM and the World Bank	Potentially Influencing Party	English	Email, telephone calls, memo, video conference	Face to face meetings on a regular basis.
	Other Development Partners (donors, UN agencies etc.)	Interested Party	English	Email, telephone & radios	Face to face meeting on a regular basis.
	National NGOs, international NGOs	Interested Party	English	Email communication	The NGOs have taken most of the roles of the government in service delivery and it would be important to coordinate and work with them closely – on a quarterly basis
State Level	Business community / Construction Companies	Potentially Influencing Party	English	Email, telephone calls Face-to-face meetings with like-minded businesses and construction companies (e.g. prior to bidding processes)	There are many business companies in the counties, though some lack capacity and would need some basic training. Contact should be established at least on a bi-annual basis

¹⁵ On the national level, virtual meetings are possible and in case the situation on Covid19 improves, in-person meetings will consider respective provisions on prevention of spreading the virus following guidance by WHO and instructions by the Government of South Sudan.

County Level	Members of the County Coordination Committee	Potentially Influencing Party	English and locally applicable languages	Email, telephone calls Face-to-face meetings, for example at regular County Coordination Committee meetings	This is an important committee to ensure that implementation of the project in the Bomas and Payams run smoothly. Contact should be maintained on a weekly basis during implementation
	County Government	Potentially Influencing Party	English and locally applicable languages	Email, telephone calls Face-to-face meetings	Need for close coordination and information sharing for smooth implementation. Contact should be initiated on a weekly basis during implementation
Boma and Payam Level	Members of the BDCs and PDCs	Potentially Influencing Party	English and locally applicable languages	telephone calls/ word of mouth Face-to-face meetings with BDCs and PDCs	Very important body - link between the community, the county and development partners. Contact should be initiated on a weekly basis during implementation
	Traditional leadership and local religious leaders	Potentially Influencing Party	Locally applicable languages	Email, telephone calls Face-to-face meetings	Regular contact, at least on a monthly basis during implementation
	Women	Vulnerable Group	Locally applicable languages	Engagement with community officers Face-to-face meetings at community level	Must be involved since most service delivery issues impact them either directly or indirectly
	Girls	Vulnerable Group	Locally applicable languages	Engagement with community officers Face-to-face meetings at community level	Need more awareness and empowerment, and therefore need to be included as a target group
	Vulnerable Households	Vulnerable Group	Locally applicable languages	Notice board Engagement with community officers Face-to-face meetings at community level	Cannot afford services at high cost and need to receive particular attention in the selection process of beneficiaries
	Youth	Vulnerable Group	Locally applicable languages	Notice board Engagement with youth representatives Face-to-face meetings at community level	Need to be empowered and should therefore be important beneficiary in project activities, as well as being integrated into consultations
	IDPs and Returnees	Vulnerable Group	Locally applicable languages	Notice board Engagement with community officers	May find that their place of origin or home is occupied by other people

				Face-to-face meetings at community level	
	Refugees	Vulnerable Group	Locally applicable languages	Notice board Engagement with refugee representatives Face-to-face meetings at community level	Must be involved since most service delivery issues impact them either directly or indirectly
	Host Communities	Vulnerable Group	Locally applicable languages	Notice board Engagement with community authorities Face-to-face meetings at community level	Need more awareness and empowerment, and therefore need to be included as a target group
	Ethnic minority groups	Vulnerable Group	English and locally applicable languages – in particular language of the minority group	Notice board Engagement with community representatives Face-to-face meetings at community level	Feel marginalized and mechanisms need to be in place to empower and involve them in productive endeavours
	People with disabilities	Vulnerable Group	Locally applicable languages	Notice board Notice board Engagement with community representatives Face-to-face meetings at community level	Need to have voice in the decision making to avoid further marginalization
	General community members	Potentially Influencing Party	Locally applicable languages	Notice board Face-to-face meetings at community level	Need to have clear information dissemination in order to be inclusive
	Potential community workers	Potentially Influencing Party	Locally applicable languages	Notice board Face-to-face meetings at community level	Contribute to the workforce of subprojects

6. Stakeholder Engagement Program

6.1 Purpose and Timing of Stakeholder Engagement Program

Project preparation and subproject designs have been relying significantly on stakeholder engagement in order to gain a granular understanding of needs and priorities at the community level and assess any potential environmental and social risks the project or subprojects may have. This required some degree of rapid consultations with affected populations, some of which had been conducted in the form of conflict assessments by IOM, and some of which were conducted initially for ECRP I in additional counties (see annex). Furthermore, IOM conducted consultations with refugees and host communities to prepare for the new beneficiary groups that have been added under Phase II.

Given the nature of the AF, specific project stages and locations are not yet fully defined. The SEP will be refined and adopted as the project design evolves and increased clarity over exact locations exists. The four purposes of consultations and information dissemination under the ECRP-II AF are: (a) continue to understand the service delivery and governance needs of the selected communities; (b) reception of feedback and comments as well as grievances from all stakeholders on sub-project design, implementation as well as potential environmental and social risks and impacts and mitigation measures; (c) provision of regular information and feedback to stakeholders related to project implementation progress and any other emerging issues throughout the project cycle and (d) provision of transparent and accountable mechanisms on all aspects of the project and subproject design and implementation. To ensure this, a grievance redress mechanism (GRM) will be continued. It is designed to allow all affected individuals and groups to report on project-related grievances or to provide comments and feedback. In addition, the amended ESCP and ESMF will be publicly disclosed at the county level in selected counties to ensure that everyone is informed about social and environmental risks and respective mitigation measures in relation to the project and its AF. For this purpose, a non-technical summary will be prepared in the local languages.

Since the newly added flood protection activities may involve larger scale infrastructure which may require land acquisition, Free, Prior, Informed Consent (FPIC) may be required. As the exact location and level of impact is not known at this time, it is not possible to determine where FPIC is required. Hence, the project during implementation and once the exact location of the sub projects is identified will assess the risks and determine whether FPIC is required or not. Subproject implementation plans, based on the context analysis for each community/county, will include how different interest groups will express their voices.

6.2 Proposed Strategy for Information Disclosure

Information disclosure to the beneficiary communities and other interested parties relies on the following key methods: radio broadcasting, community meetings in coordination with local authorities (county governments, BDCs and PDCs), phone communication (SMS), and notices at the payam and boma level. Information is disclosed in English or the respective key local languages, where appropriate. Local authorities, such as traditional authorities, religious leaders, and county governors are requested to inform communities in community meetings and through disclosure at project locations.

Table 4: Strategy for Information Disclosure

Project Stage	Information to be disclosed	Methods proposed	Timetable: locations / dates	Targeted stakeholders	Estimated disclosure targets	Responsibilities
Project Design	SEP (including GRM)	Radio, community meetings, community boards, church/ mosque, markets, social events etc	Prior to disbursement	Community members (incl all vulnerable groups), national and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	90% of all beneficiaries and affected communities	MoFP / IPs
	ESCP	Email, community meetings, community boards	Prior to disbursement	Community members (incl all vulnerable groups), national and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	90% of stakeholders	MoFP / IPs
	ESMF	Email, community meetings, community boards	Prior to disbursement	Community members (incl all vulnerable groups), national and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	90% of stakeholders	MoFP / IPs
	Workers' GRM	Worker meetings and workers' contracts	Prior to engaging project workers	All project workers	90% of workers	MoFP / IPs

	GBV Action Plan	Email, community meetings, community boards	Prior disbursement to	Community members (incl all vulnerable groups)	90% of stakeholders	MoFP / IPs
Project Implementation	ESMP/RAPs, IP Plans, etc... for subprojects	Radio, community and county level boards	Prior construction works commencing to	Community members (incl all vulnerable groups), local governments, CSOs and NGOs, business community, county coordination committee	40% of stakeholders	PMU / IPs
	Project Reports	Radio, community and county level boards	When available	Community members (incl all vulnerable groups), national and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	40% of stakeholders	PMU / IPs
	SEP (including GRM and security issues, such as using the GRM without fear of retaliation)	Radio, community meetings, community boards, church/mosque, markets, social events etc	Throughout implementation	Community members (incl all vulnerable groups), national and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	40% of all beneficiaries and affected communities	MoFP / IPs

6.3 Proposed Strategy for Consultation

This plan lays out the overall consultative processes of the project with its different stakeholders. In principle, the PMU and IPs that oversee sub-component activities follow their existing participatory engagement and consultation methods, especially with affected communities and beneficiaries. For example, these will follow specific tools and methods of community consultations that IOM has been deploying in the Project. The Project ensures that the tools and methods of other IPs fulfil the requirements outlined throughout this document and are in line with the ESF. In case any additional needs arise from identified deficiencies or from context changes, the project will adapt accordingly.

The GRM will be another means of consultation, as complaints received will be filed, assessed and responded to (see below).

An inter-ministerial steering committee, with MoFP as the Chair, continues to guide the project. The committee comprises undersecretaries from key government agencies such as MoFP, LGB, Ministry of Gender, Child, Social Welfare (MoGCSW), Relief and Rehabilitation Commission (RRC) under the Ministry of Humanitarian Affairs along with the Ministries of Water, Health and Education. The steering committee will meet bi-annually to discuss key policy issues with the Bank. An inter-ministerial technical working group will also continue at the national-level and be represented by the Director Generals from the same Ministries. It is chaired by the MoFP and members meet on a quarterly-basis, or more often as needed, to discuss technical implementation-related issues with the Bank. At the state level, the project does not have any coordination body, but informs/consults with governors as needed. At the county-level, a coordination committee chaired by the county commissioner with the county planning officer, relevant department heads and the RRC county coordinator serves as the point of contact for the project.

Table 5 Strategy for Consultation

Project Stage	Topic of Consultation	Suggested Method	Timetable: location and dates	Target stakeholders	Expected Outcome	Responsibilities
Project Design	Overall project activities	Inter-ministerial Steering Committee Radio, community meetings	Juba	CSOs and NGOs, development partners, business community, steering committee, county coordination committee, Community members (incl all vulnerable groups),	Understanding of the service delivery and governance needs of the selected communities	MoFP and IPs
	SEP (including GRM)	Radio, community meetings, notice boards at county, payam and boma level	Juba / County / Payam	Community members (incl all vulnerable groups), Boma Development Councils (BDCs) and Payam Development Councils (PDCs), national and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	Reception of feedback and comments as well as grievances from all stakeholders on project design, as well as potential environmental and social risks and impacts and mitigation measures Provision of transparent and accountable mechanisms on all aspects of the project and design	MoFP and IPs
	ESCP	Inter-ministerial Steering Committee	Juba	National and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	Provision of transparent and accountable mechanisms on all aspects of the project and design	MoFP and IPs
	ESMF	Inter-ministerial Steering Committee Email	Juba	National and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	Reception of feedback and comments as well as grievances from all stakeholders on project design, as well as potential environmental and social	MoFP and IPs

					risks and impacts and mitigation measures	
Project launch / Entry	Introduction of the project and how the various stakeholders would be working	Stakeholder meeting / conference Community meetings	Juba / State / County	Community members (incl all vulnerable groups), BDCs and PDCs, national and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	Understanding of the service delivery and governance needs of the selected communities	PMU and IPs
Project Implementation	Types of community infrastructure	Community meetings, notice boards at county, payam and boma level	Boma / Payam	Community members (incl all vulnerable groups), local governments, CSOs and NGOs, business community, steering committee, county coordination committee	<p>Understanding of the service delivery and governance needs of the selected communities</p> <p>Reception of feedback and comments as well as grievances from all stakeholders on project design, implementation as well as potential environmental and social risks and impacts and mitigation measures</p> <p>Regular information and feedback to stakeholders related to project implementation progress and any other emerging issues</p> <p>Provision of transparent and accountable mechanisms on all aspects of the project and subproject design and implementation</p>	PMU and IPs
	Project Implementation as	Radio, community meetings, notice	Juba/State/County	Community members (incl all vulnerable groups), national and	Provide regular information and feedback to	

	a whole, including security parameters for project-affected persons	boards at county, payam and boma level		state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	stakeholders related to project implementation progress and any other emerging issues	
	Sub-project ESMPs, RAPs, etc...	Community meetings, notice boards at county, payam and boma level	Boma / Payam	Community members (incl all vulnerable groups), local governments, CSOs and NGOs, business community, steering committee, county coordination committee	Provision of transparent and accountable mechanisms on all aspects of the project and subproject design and implementation Reception of feedback and comments as well as grievances from all stakeholders on project design, implementation as well as potential environmental and social risks and impacts and mitigation measures	PMU and IPs
	M&E	Stakeholder meetings, community meetings, notice boards at county, payam and boma level	Juba/State/County	Community members (incl all vulnerable groups), national and state governments, local governments, CSOs and NGOs, development partners, business community, steering committee, county coordination committee	Reception of feedback and comments as well as grievances from all stakeholders on project design, implementation as well as potential environmental and social risks and impacts and mitigation measures Regular information and feedback to stakeholders related to project implementation progress and any other emerging issues	PMU and IPs

6.4 Proposed Strategy to Incorporate the View of Vulnerable Groups

The PMU ensures that women and other vulnerable groups participate in consultative processes and that their voices are not ignored. This requires specific meetings with some of the above identified vulnerable groups at the community level, in addition to general community consultations. For example, women are more outspoken in women-only consultation meetings than in general community meetings. Similarly, separate meetings are held with young people or with ethnic minority groups for each subproject or activity. Further, it is important to rely on other consultation methods as well, which do not require physical participation in meetings, such as social media, SMS, or radio broadcasting, where feasible, to ensure that groups that cannot physically be present at meetings can participate. Where this is not possible, community facilitators visit households of vulnerable people, in particular the elderly and persons with disabilities, that are not able to attend communal meetings.

In view of promoting gender equality, it is most important to engage women's groups on an ongoing basis throughout the lifetime of the project. Women voicing their concerns and contributing in the decision-making process on issues such as community infrastructure should be encouraged, especially in governmental or traditional committees predominantly consisting of men.

All implementing partners and contractors are similarly encouraged to deploy female staff, in particular staff to interface with community members.

GRMs are designed in a way that all groups identified as vulnerable (see below) have access to the information and can submit their grievances and receive feedback as prescribed.

6.5 Timelines

The project is planned until March 2027. Information disclosure and consultations are especially relevant throughout the early stages of the AF, but also throughout the project cycle. Activities under each sub-component will include further consultations prior to their commencement to ensure a good selection of beneficiaries, transparency and accountability on project modalities, and to allow community voices to form the basis of the concrete design of every intervention and consultations continue throughout the project cycle.

6.6 Reviews of Comments

The PMU and IPs, in the implementation of different sub-components of the project gather all comments and inputs originating from community meetings, SMS, GRM outcomes, surveys and FGDs. The information gathered is submitted to the PMU – specifically to the Social and Environmental Safeguards Specialists - to ensure that the project has general information on the perception of communities, and that it remains on target. It is the responsibility of the IPs to respond to comments and inputs, and to keep open a feedback line to the communities, as well as the local authorities.

This SEP provides the overarching guidelines for the rolling out of stakeholder engagements..

7. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

Budgetary resources are dedicated to the implementation of the SEP, as laid out in the budget summary. While there will be an overall budget administered by the PMU to monitor SEP and other ESMF activities; the PMU and IPs have dedicated budget resources to implement the SEP as part of the integral project costs for each activity. The budget is allocated by the PMU and controlled by the PMU Social Safeguards Specialist.

Table 6 Indicative Budget for implementation of SEP

Stakeholder Engagement Activity	Total Cost (USD)
Social experts	
Social safeguards specialist at PMU	Included in staff costs
Social safeguards specialist at IOM (30% of time)	Included in staff costs
2 Social Safeguards Specialist at 2 other IPs to implement AF (30% of their time)	Included in staff costs
Community Liaison Officers (IOM)	Included in staff costs
Consultation and disclosure	
Consultation sessions in all the districts/communities/relocation sites	225,000
Consultation sessions in AF districts	70,000
Disclosure campaigns	225,000
Disclosure campaigns in AF districts	70,000
Grievance redress mechanism	
GRM Hotline costs per month 4,000	192,000
Rolling out of GRM in AF Districts	50,000
Monitoring and documentation of ESMF implementation	
Verification of SEP activities (field visits etc), including in AF districts	Included in PMU travel budget
TOTAL	832,000

8. Management Functions and Responsibilities

The stakeholder engagement activities fulfill part of the commitments in the Environmental and Social Commitment Plan (ESCP). The ESCP is part of the legal agreement between the Bank and the borrower, which ensures project management is committed to the planned activities. It is part of the project approval documents and guides the Bank in monitoring project progress. The Monitoring & Evaluation (M&E) Plan of the project, as part of the Operational Results Framework (ORF) contains indicators to help track progress of the ESCP implementation. A progress report is periodically produced and shared with stakeholders for review, deliberation and action.

The overall responsibility for the implementation of the SEP lies with the PMU Project Manager. The Plan is overseen on a day-to-day basis by the PMU Social and Environmental Specialists. The Officers maintain a stakeholder database for the overall project and lead a commitment register. However, while the PMU oversees all coordination and disclosure-related consultations, IOM and other IPs will implement the SEP at the community level in their respective project sites and report on their activities to the PMU Social and Environmental Specialists on a monthly basis. The PMU undertakes field verification activities jointly with IOM and other IPs – at least every other month, or during planned events.

IOM and other IPs identify dedicated staff responsible for the implementation of the SEP within the organization. Staff names are submitted to the PMU. Selected staff must have ample qualifications to implement the SEP, as stipulated by the terms of reference for the position in the IOM human resource system. The reporting lines between community liaison staff and senior management are defined by IOM's or the other IPs' organizational structure. IPs commit to communicate the stakeholder engagement strategies for their respective sub-components internally.

9. Grievance Redress Mechanisms

Under the World Bank ESSs¹⁶, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.¹⁷ One of the key objectives of ESS10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances'.¹⁸ This Project GRM facilitates the project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The ECRP-II provides mechanisms to receive and facilitate resolutions to such concerns, which will be extended to the AF locations. This section lays out the grievance redressal mechanisms (GRM) for the ECRP. It is based on lessons from the GRM of the initial Local Governance Development Project (LGSDP) and the ECRP-I.

The LGSDP included a refined GRM, which was based on multiple local institutions for conflict resolution, and which was to function as an early warning system for conflict. However, lessons from the LGSDP showed that the set up was too complicated, and despite reliance on local individuals and structures, it was barely used. For the ECRP-I a more simple GRM was designed, which could be rolled out across different areas with different ethnic groups and social structures. The GRM was more frequented by project-affected persons.

As per World Bank standards, the GRM is operated in addition to a separate GBV/SEA and Child Protection Risk Action Plan, which includes reporting and referral guidelines (see GBV/SEA and Child Abuse Action Plan). However, the Project GRM also caters for GBV/SEA cases. Additionally, in line with the provisions of ESS2, a grievance redress mechanism is provided to all direct workers and contracted workers to raise workplace concerns. Workers are informed of this GRM at the time of recruitment and the measures put in place to protect them against any reprisal for its use. This worker GRM is included in the project's Labor Management Procedures (LMP) (see ESMF). Given the small-scale nature of works and focus on locally sourced labor, the intake mechanisms of the overall GRM also allow intake of grievances under ESS2. Note that for SH at the workplace, provisions under the GBV/SEA Action Plan apply.

The GRM are designed to capture the high potential for conflict, and to cater for a variety of different ethnic groups with differing social structures and local mechanisms to solve grievance. Experience has shown that there are disagreements over local level planning and implementation processes. Furthermore, the project itself may cause grievances, or existing community and inter-community tensions may play out through the project. The source of grievances, in regard to project implementation, can also sometimes be the local governance or power distribution itself, e.g., how local government and power holders will routinely place brokers in privileged positions or how district or subdistrict local governments are able to favor some communities and not others, for example.

It is therefore key in the fragile environment of South Sudan to ensure that grievances and perceived injustices are handled by the project, and that the project aids mitigate general conflict stresses by

¹⁶ World Bank, Environmental and Social Framework, 2018.

¹⁷ Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which is laid out in the Labour Management Plan (LMP). The World Bank's Good Practice Note on 'Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works'¹⁷ spells out requirements for a GBV grievance redress mechanisms, which is laid out in a separate GBV/SEA and Child Protection Risks Action Plan.

¹⁸ World Bank, 2018, p. 131.

channeling grievances that occur between people, groups, government actors and beneficiaries and project staff or contractors. Aggrieved parties need to be able to refer to institutions, instruments, methods and processes by which a resolution to a grievance is sought and provided. The GRMs provide an effective avenue for expressing concerns, providing redress and allowing for general feedback from community members.

In order to guarantee that the project has a wider impact on injustices and conflict stresses, it addresses a wider range of injustices as they manifest themselves around aid and development projects. By enabling people to contest perceived unfair practices and asymmetric power distribution, power structures can be re-arranged and systems of social accountability strengthened. Especially the citizen – LG nexus is an important field for tackling conflict stresses as the government authorities mostly relate to people in regards to security and conflict.

The GRM aims to address concerns effectively and in a timely and transparent manner. It is readily accessible for all project-affected parties and does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all the needs and concerns of project-affected parties.

A GRM has been implemented since the ECRP-I. In general, the project team received feedback and complains consistently from the different locations. The set-up of helpdesks after/during conducting community engagement activities proved very effective in gathering community feedback.

The most frequently reported grievance concerned the lack of a payment incentive or sitting allowance for participants. The complainants argued that a full week of community entry workshops kept them away from their other obligations. Other BDC and PDC members indicated that the bomas were far apart, often several hours away by foot, and that they would need transportation to satisfy the BDC/PDC criteria of meeting on a regular basis. The ECRP teams on the ground responded to these concerns by verbally recognizing the obstacles the community members have had to overcome to participate, expressing sincere gratitude for the lengths to which participants have gone to be a part of ECRP, emphasizing ECRP commitment to ensuring commensurate transport allowance, and, on certain occasions where lack of transportation would have made attendance impossible or extremely arduous, providing transportation via IOM vehicles. Additionally, the ECRP team reiterated that the community-led nature of the project is essential and that the commitment and motivation demonstrated by PDC / BDC members will ultimately pay off once infrastructure projects are made a reality and once PDC / BDC members begin to use this knowledge and experience to continue the momentum towards locally driven community development.

The second most prevalent complaint was in regard to low budget allocations for particular payams. Some community members hoped for more expensive infrastructure, such as water yards or schools. However, they realized during the workshops that their budget/token allocations could only cover smaller, less-costly infrastructures. The project team acknowledged the concerns raised by the community, reassuring the members that ECRP will continue to support the communities to advocate for funding and encouraged them to speak with the local authorities for the wider community needs which unfortunately cannot all be met by the ECRP.

9.1 GRM Value Chain

Step 1: Grievance Uptake: Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially unresponsive or biased.

Means of Filing a Grievance

There are four distinct means, at least two of which must be made available at the project locality for people to file a grievance (for grievance form and register see Annex 1 and 2):

1. A phone number for a hotline operator: The phone number of a grievance hotline operator is widely disseminated among project stakeholders. The Hotline Operator is available from 8.00 am to 5.00 pm every day through a toll-free number. The hotline operator is set up and managed by the PMU. Any concerned party can call the hotline number and file a grievance with the Project.
2. A help desk must be set up by the respective IP during the implementation of sub-project activities in an area. It should be manned by the implementing staff, especially its community liaison officers, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk.
3. Relevant assigned personnel available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the contractor, implementing partner or the local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance.
4. A suggestion box must be installed at the nearest Boma or Payam office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in writing.

GBV/SEA/SH-related Grievance in Step 1

Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on GBV/SEA/SH-related grievances. No grievance uptake mechanism can reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of GBV/SEA/SH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centered approach from mandatory reporting.

The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor's

informed consent – report the case to one of the ECRP's formal grievance recipients. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

Cases of GBV/SEA/SH can be reported through the general Project GRM – any project staff, staff manning help desks, through the suggestion box, or through the GRM Hotline Operator

The grievance recipient is responsible for the recording and registration of the complaint. A GRM operator cannot reject a GBV/SEA/SH complaint. At the same time, however, the project can only respond to a GBV/SEA/SH complaint if it is directed into the designated GRM channels.

Confidentiality: All grievance recipients and anyone handling the GBV/SEA/SH related grievances must maintain absolute confidentiality in regard to the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. There are exceptions under distinct circumstances, for example a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others, in which case referrals to lifesaving services should be sought; b) if the survivor is a child and there are concerns for the child's health and safety. The survivors need to be informed about these exceptions.

Informed Consent: The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up. Asking for consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or IPs), and/or to undertake any action (for instance investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on. In the case of children, informed consent is normally requested from a parent or legal guardian and the children.

Incident reporting

Severe incidents (defined as an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, for example: Fatality, GBV, forced or child labor) will be reported within 48 hours to the PMU and the World Bank.

For all other grievances, the respective IP at the state level decides whether the grievance can be solved locally, with local authorities, implementers, or contractors and whether an investigation is required. The first ports of call have in-depth knowledge of communal socio-political structures and is therefore able to address the appropriate individuals if the case can be solved at the local level.

At all times, the IP provides feedback promptly to the aggrieved party, for example through the phone or through the community facilitator. Feedback is also communicated through stakeholder meetings and beneficiary meetings during project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Records of all feedback and grievances reported are established by the IP or the PMU. All feedback is documented and categorized for reporting and/ or follow-up if necessary. For all mechanisms, data is captured in an excel spreadsheet. The information collected, where possible, includes the name of the

person providing feedback as well as the boma, payam and county, cooperating partner (where applicable), the project activity and the nature of feedback or complaint.

Step 2: Sort and Process: All registered grievances are transferred to the GRM Focal Point at the respective PMU or with IOM at state or national level – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM focal point categorizes the complaint. Worker-related grievances are handed over to the workers' GRM. Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the focal point has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH is required for all GRM operators and relevant project staff. Where grievances can be handled locally, the focal point will return these grievances to the appropriate local structures to be handled by existing dispute settlement mechanisms. However, these can only be involved if the focal point assesses that the complainant is not a member of a vulnerable group or minority that would not be catered for by the local mechanism in an equal manner.

For grievances handled under the general Project GRM, the GRM Focal Point determines the most competent and effective level for redress and the most effective grievance redress approach. The focal point further assigns timelines for follow-up steps based on the priority of the grievance, and make a judgment and reassigns the grievance to the appropriate staff or institution. The person excludes grievances that are handled elsewhere (e.g. at the court). The focal point should offer the complainant option/s for resolution of their grievance.

The GRM Focal Point also transfers the grievance information into a more comprehensive grievance register.

Step 3: Acknowledgement and Follow-Up: The respective IP or the PMU decides whether a grievance can be solved locally, with local authorities, contractors, or NGOs, and whether an investigation is required. The first ports of call have in-depth knowledge of communal socio- political structures and therefore are able to recommend to the GRM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

At all times, the implementer, or the PMU (the GRM Focal Point) provides feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

GBV/SEA/SH in Step 3

Referrals are a process through which the survivor gets in touch with professionals and institutions regarding her case. Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The grievance recipient instantly provides the survivor with contacts of the available referral services in the respective area. If the survivor wishes for any assistance with transport or payment for services, the grievance recipient provides allowances. Referral services are provided even in cases, where the survivor opts to not pursue the case through the GRM or through legal channels.

The grievance recipient explains to the survivor his or her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information. The survivor is informed about his or her right to place limitations on the type of information they want shared. The survivor's consent must be documented.

Step 4: Verify, Investigate and Act: The GRM Focal Point, then undertakes activity-related steps in a timely manner. The activities include: verifying, investigating, redress action and plan.

Verification:

- Check for eligibility (objectively based on set standards and criteria) of complaint in terms of relevance to the project.
- Escalate outright grievances that require high level interventions within the implementer or PMU
- Refer outright grievances that are outside the project jurisdiction (e.g. refer to PMU or relevant external institution)

Once eligibility is determined, the IP will categorize the complaint into defined categories:

Investigation:

- GRM Focal Point to appoint an independent investigator (safeguards experts, professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)
- Collect and preserve evidence
- Analyze to establish facts and compile a report

Grievance Action Plan

- Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction
- undertake mutually agreed follow-actions
- Update of complainant
- Provide users with a grievance redress status update and outcome at each stage of redress, (iii) update the IP team on grievance redress across the GRM value chain.

GBV/SEA/SH in Step 4

The PMU Social Development Specialist and the Social Safeguard Specialist of the IP's Organization are the key focal points for management of such grievances and concerns and work closely with respective GBV Specialist counterparts at the implementers in the implementation of the GBV/SEA/SH Action Plan, which contains all information on the GBV/SEA/SH referral system.

Once a case has been taken in by a GRM recipient, and informed consent of the survivor is obtained to proceed with the case, the case file is submitted to the GBV Specialist. The GBV Specialist will first ensure that the survivor has been provided with all necessary GBV referral services, and ensures that the survivor is in safety.

Where the GBV/SEA/SH grievance was allegedly committed by a project worker, the grievance is reported to the respective employing agency. The PMU GBV Specialist follows up and determines jointly with the GRM Focal Point of the respective partner the likelihood that the allegation is related to the project. The GBV Specialist follows up and ensure that the violation of the Code of Conduct is handled appropriately, e.g., the worker is removed from his or her position and employment is ended. The responsibility to implement any disciplinary action lies with the employer of the perpetrator, in accordance with local labor legislation, the employment contract, and the code of conduct. The GBV Specialist reports back to the survivor on any step undertaken and the results.

Where the survivor has opted to take a formal legal route with the case, the PIU GBV Specialist ensures that the survivor has all the support required to file a case at court. The GRM process still proceeds with the survivors' consent. Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GRM's remit to conduct investigations, to make any announcements, or to judge the veracity of an allegation. The GRM should refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received.

Since this project assumes a fully survivor-centered approach, no information can be passed on without the consent of the survivor. If the survivor does not wish for the case to be pursued, the survivor shall be offered access to referral services and the GRM operator or grievance recipient should note that the survivor did not wish for the case to be pursued, and the case is considered solved.

Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions; and appropriate actions have been taken against the perpetrator according to SEA mechanisms; b) the service provider has initiated accountability proceedings with the survivor's consent.

If the survivor does not want to launch a complaint with the employer, the case is closed. If the complaint proceeds, the case is reviewed by the PMU GBV Specialist and a course of action is agreed on with the respective IP/employer. The alleged perpetrator's employer takes agreed-on disciplinary action. Once the action is deemed appropriate by the GBV Specialist, the case is recorded as closed.

Step 5: Monitor, Evaluate and Provide Feedback: The GRM Focal Point provides feedback to GRM users and the public at large about:

- results of investigations;
- actions taken;
- why GRM is important;
- enhance the visibility of the GRM among beneficiaries; and
- increase in users' trust in the GRM

Any implementer reports on its GRM to the PMU on a monthly basis. Monthly reporting to the PMU provides information on the grievance and how it was handled as well as all information from the grievance register. However, it can omit the names of the aggrieved parties where necessary.

The PMU undertakes the following monitoring actions:

- develop indicators for monitoring the steps of GRM value chain;
- track grievances and assess the extent to which progress is being made to resolve them;
- conduct a stakeholder satisfaction survey for the GRM services;

- conduct analysis on the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact; and
- provide a report on grievance redress actions pertaining to the steps of GRM value chain.

The PIU will evaluate the GRM by

- analyzing grievance data to reveal trends and patterns,
- sharing GRM analysis in management meetings; and
- taking corrective action on project implementation approaches to address the grievance.

GBV/SEA/SH in Step 5

All entities reporting on GBV/SEA/SH-related cases ensure that reports do not contain any information with the potential of identifying survivors (including names of survivors, families and perpetrators).

Furthermore, the grievance recipient needs to provide ongoing feedback to the survivor throughout the process. After conclusion of any investigation, the survivor must be informed first to determine whether the perpetrator can be informed and proposed sanctions against the perpetrator can be taken.

9.2 Information Disclosure and Consultations

ESS10 makes it essential to identify and undertake inclusive and ongoing engagement with project stakeholders and to disclose all relevant information to stakeholders, in particular those project-affected groups or individuals that are disadvantaged or vulnerable due to their circumstances, and the public. Direct and indirect project stakeholders have been identified in the Stakeholder Engagement Plan (SEP). Stakeholder consultations for the 2 new states with state and county governments are to be undertaken prior to the commencement of any other project activities under Component 3 of the Project. The SEP is continuously updated, specifically in accordance with the identified needs. All relevant information needs to be made available to stakeholders in a timely manner, including about planned sub-components of the project, management measures and monitoring activities.

9.3 WB's Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

10. Monitoring and Reporting

10.1 Involvement of Stakeholders in Monitoring Activities

Adequate institutional arrangements, systems and resources are in place to monitor the SEP. The main monitoring responsibilities are with the PMU. This is led by the PMU Social Safeguards Specialist. The PMU Project Manager has the overall responsibility for the implementation of the environmental and social mitigation measures, including the SEP and site- or activity- specific SEP, as well as for monitoring and inspections for compliance with the SEP.

The GRM are a distinct mechanism that allows stakeholders, at the community level in particular, to provide feedback on project impacts and mitigation programs.

In addition, IPs, as sub-implementers can have their own dedicated means of monitoring impacts, administering mitigating measures and stakeholder involvement. These are implemented within the partner's specific sub-component activities. IOM and other IPs share these means with the PMU and integrate community-level stakeholder inputs into regular monitoring and reporting activities. IPs report the number, locations and results of their SEP-related activities to the PMU on a monthly basis. Lessons from stakeholder engagement are listed in the above section on 'Previous Stakeholder Engagements'.

A Third-Party Monitoring Agent (TPMA) is engaged by the PMU to provide independent operational review of project implementation, as well as verification of all project results, including the implementation of the SEP. This includes assessing adherence at all implementation levels to the procedures set out in the Project Operations Manual (POM) and other relevant project documents, and in verifying outputs of all project activities. The Project's M&E Plan includes monitoring indicators for the measurement of the performance of the SEP (e.g., 100% of grievances are addressed).

Monitoring indicators

Sector	Activity	Indicator
Information Dissemination	- Communication of information about Project throughout design and implementation	<ul style="list-style-type: none">- # of meetings with the community to share information about the project and the content of the CoC with communities- # of meetings with vulnerable groups- # of radio broadcasts disseminating information about the project- # of instruments and project reports disclosed on Project website
Stakeholder Consultations	- Consultation of stakeholders throughout Project design and implementation	<ul style="list-style-type: none">- # of consultation meetings at the community in preparation of subprojects- # of meetings with vulnerable groups in preparation of subprojects
GRM	<ul style="list-style-type: none">- GRM Hotline is in place- Cases are handled and responded to	<ul style="list-style-type: none">▪ Existence of hotline▪ % of cases closed

The PMU digests all reporting by the TPMA and IPs, as well as its own findings, and produces an overall environment and social progress report, which will contain a distinct section of stakeholder engagement, which is provided to the World Bank. The project follows a quarterly reporting cycle. These quarterly reports are further shared with all stakeholders, as defined in the SEP.

10.2 Reporting Back to Stakeholder Groups

Results of stakeholder engagements are regularly reported back to the affected communities, as well as to the relevant local authorities. It is the responsibility of the PMU to ensure that all relevant reporting is shared through the above defined public means. At a sub-component and activity level, IPs are responsible for disclosing their stakeholder engagement results and relevant reporting.

Annex 1: GRM Form

Reference No: _____

Details of Complainant:

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent

Full name: _____

☐ I wish to raise my grievance anonymously

☐ I request not to disclose my identity without my consent

Contact

☐ **By Mail:** Please provide mailing address:

Gender of Complainant:

Age of Complainant:

Contact Information

Please tick how you wish to be contacted: - ☐ E-mail, ☐ Telephone, ☐ in Person

☐ By Telephone: _____

☐ By E-mail _____

- ☐ One time incident/grievance Date ____/____/____
- ☐ Happened more than once (how many times) _____
- ☐ On-going (currently experiencing problem)

Description of Incident or Grievance:

Location of grievance:

What happened? Where did it happen? Who did it happen to? What is the result of the problem?

What would you like to see happen to resolve the problem?

Annex 2: Grievance Register

The grievance register will contain the following information (ideally in an excel file, or if at local level in a book) :

Table 7 Grievance Register

Type of Information	Response
Complaint/ Log number	
Reference document (s)	
Date complaint made	
Date complaint received	
Category of Grievance	
Method of Logging: Direct Communication; Suggestion Box; Toll-free Line;	
Complaint name (state if anonymous)	
Location in which complained action took place (district, village)	
Caller contacts for follow up	
Gender	
Age	
Parties against whom complaint is made (unit/contractor/agency etc)	
Nature of Complaint ["SEA/GBV"; "Timing of Payment"; "Amount of Payment"; "Inclusion or Issue regarding Project benefits" or create standard categories based on complaint type]	
Description of Complaint	
Nature of feedback (describe)[In case issue type is GBV/SEA immediate referral to the GBV referral system]	
Verification and investigation (describe)	
Recommended action (describe)	

Timeline of Initial feedback (within 5 days) [investigate the claim within 5 working days, and share findings/feedback with relevant stakeholder]	
Status update (and justification if it is not expected to be resolved within the timeframe set out)	
Date resolved	
Indicate if a spot check has been conducted (you can include then in the narrative reports spot checks for resolutions of x number of complaints have been conducted)	

Annex 3: GBV/SEA Case Registration Form

Table 8 GBV/SEA Case Registration Form

GBV/SEA/SH Case Registration Form	
Administrative Information	
	Grievance ID
	Code of Survivor (Employ a coding system to ensure that client names are not easily connected with case information)
	Date of grievance registration
	Date of Incident
	Reported by survivor or an escort of the survivor, in the presence of the survivor
	Reported by someone other than the survivor without survivor present
Survivor Information	
	Gender / age
	Location / Residence
	Current civil/marital status
	Occupation
	Is the survivor a person with mental or physical disabilities?
	Is the survivor an unaccompanied or separated child?
	Was the perpetrator related to the project?
	Has Informed Consent been provided? yes/no?
	Has the case been reported elsewhere (including police / lawyer/health services/psychosocial counseling, other)?
Sub-Section for Child Survivor	
	If the survivor is a child (less than 18 years), does he or she live alone?

	If the survivor lives with someone, what is the relation between her/him and the caretaker? (parent/guardian; elative; spouse; other)	
	What is the caretaker's current marital status?	
Details of the Incident (in survivor's words)		
	Details of the incident	
	Incident location and time	
	Were money, goods, benefits and/or services exchanged in relation to the incident?	
Alleged Perpetrator Information		
	Number of alleged perpetrators	
	Sex of alleged perpetrators	
	Age group of alleged perpetrator(s)	
	Indicate relationship between perpetrator(s) and survivor	
	Main occupation of the alleged perpetrator(s)	
	Employer of the alleged perpetrator(s)	
Planned Actions / Actions Taken		
	Was the survivor referred by anyone?	
	Was the survivor referred to a safe house / shelter?	
	Which services does the survivor wish to be referred to? <ul style="list-style-type: none"> - Psychosocial services - Legal services - Police - Health services - Livelihood program 	
	What actions were taken to ensure the survivor's safety?	
	Describe the emotional state of the client at the beginning of the report	
	Other relevant information	

Annex 3: Stakeholders Consulted

Below is a list of high-level stakeholders consulted for the ECRP II preparation.

Table 9 List of Persons met

No	Name	Organization	Designation
1	Angelo Deng	MoFP	Undersecretary of Planning
2	Maxwell Loboka	MoFP	Director Aid Coordination
3	Kolong Oliech	MoFP	A/Inspector of Budget
4	Aluei Daniel	MoFP	A/Inspector of Budget
5	Ayuen Peter Mach	MoFP	Sr. Inspector of Budget
6	Sabina Marcello	MoFP	A/Director Budget
7	Simon Ngo	MoFP	Inspector of Budget
8	Bol Yor	MoFP	Deputy Director of Budget
9	Theophilus Addey	MoFP	TA. Planning
10	John Awan	MoFP	Deputy Director
11	Michael Ladu	MoFP	A/Director
12	Chol Beer	MoFP	Deputy Director
13	Aluel Margaret	MoFP	Inspector
14	Gum Majur Anek	MoFP	Deputy Director of Accounts
15	Maker Joseph	MoFP	Inspector of Revenues
16	Taban John Cosmos	MoFP	Sr. Inspector
17	Jackson Wilson Bona	MoFP	A/Director of Account
18	Lwiza Deng	MoFP	Ag. Director Aidco
19	Zendia Michael	MoFP	Accountant
20	Achol Kun	MoFP	Inspector
21	Deng Gatluak	LGB	Deputy Director
22	Elias Asu Kidia	LGB	Director General
23	Augustino Doka	LGB	Deputy Director
24	Malony Akau Nei	LGB	Director General
25	Clement Kamis	LGB	Chairperson
26	Mawar Nyok Lual	RRC	Executive Director

27	Kungcien Akec	RRC	Director
28	Dr. Ayor Mr. Kur	RRC	Director General
29	George Ritti	MLHUD	Director
30	Justine Dabit	MLHUD	Ag. Director General
31	James Alam	MRB	Ag. DG Planning
32	Emmanuel Longo	UNDP	SSE UNDP
33	Piper Janoe	IOM	Project Support Officer
34	Harry Smith	IOM	Program Support Unit Coordinator
35	Gaia Baudino	IOM	Programme Coordinator (ECRP)
36	Asar Ul Haq Muhammad	IOM	S-NFI Programme Coordinator
37	Kristina Uzelac	IOM	DTM Programme Coordinator
38	Mayvelling González	IOM	DTM Officer Information Management
39	Phillip Tangermann	IOM	DTM Reporting Officer
40	Naveed Anjum	IOM	Monitoring and Evaluation Officer
41	Mahmudul Islam	IOM	Consultant
42	Tarnjeet Kang	IOM	Consultant
43	Mark Millar	NRC	Conflict Analyst
44	Daniel Mutinda	IFRC	Senior Officer, Disaster Management
45	Pape Tall	IFRC	Head of Delegation, South Sudan
46	Annette Hearn	OCHA	Deputy Head of Office
47	Kumudu Sanjeewa	OCHA	Information Management Officer
48	Dushyant Mohil	REACH	Senior Assessment Officer
49	Dylan Terry	REACH	Deputy Country Coordinator
50	Jack Philpott	REACH	Geographic Information Systems Manager
51	Emanuel Pamenas	MWRI	Undersecretary
52	Betty Scopas	MHADAM	Head of the Early Warning Systems
53	Geraud Poueme	FAO	Remote Sensing and GIS Specialist
54	Patrick Ochaya	FAO	GIS Specialist
55	Leila Shamsaifar	FAO	Natural Resource Management Specialist

56	Lia Pozzi	WFP	Senior Food Security Analyst and Deputy Head of Vulnerability Analysis and Mapping (VAM)
57	Nenad Grkovic	WFP	Head of Logistics
58	William Nall	WFP	DRM Specialist
59	Richard Aludra	Dutch Embassy	Senior Administrative Officer
60	Michiel Smet	Dutch Embassy	First Secretary Food Security, Water, Climate, Energy and Private Sector Development
61	Simeneh Gebetahu	UNHCR	WASH Officer
62	Magok Denggali	UNHCR	Assist F. Officer
63	Maria Kiani	UNHCR	SDO
64	Malar M. Smith	UNHCR	Head Sub-Office
65	Ray Chikwanda	UNHCR	Protection Officer
66	Firas Raad	World Bank	Country Manager
67	Angela Porto	World Bank	Governance Specialist
68	Leah April	World Bank	PFM Specialist
69	Makiko Watanabe	World Bank	Sr. Urban Specialist
70	Droma Bank Dominic	World Bank	Urban Specialist
71	Daniel Balke	World Bank	Strategy & Operations Officer
72	Daniel Domelevo	World Bank	Consultant
73	Paul Francis	World Bank	Consultant
74	Ray Jennings	World Bank	Consultant
75	Lukas Loeschner	World Bank	Diester Risk Mgt Specialist
76	Grace Tabu Felix	World Bank	Program Assistant
77	Stephen Amayo	World Bank	Senior FMS
78	Yalemzewud Tiruneh	World Bank	Social Development Specialist
79	James Maroa	World Bank	Environmental Specialist