

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

Stakeholder Engagement Plan

**South Sudan Public Financial Management and
Institutional Strengthening Project (P176761)**

December, 2021

List of Acronyms

BDC	Boma Development Committee
CSO	Civil Society Organization
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
FCV	Fragility, Conflict and Violence
GM	Grievance Mechanism
GOSS	Government of South Sudan
IDP	Internally Displaced Person
MOFP	Ministry of Finance and Planning
MOA	Ministry of Agriculture
MOE	Ministry of Education
MOH	Ministry of Health
NAC	National Audit Chamber
PAC	Public Accounts Committee
PDC	Payam Development Committees
PDO	Project Development Objective
PFM	Public Financial Management
PMU	Project Management Unit
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SSACC	South Sudan Anticorruption Commission (SSACC)

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1 Introduction

This document represents the Stakeholder Engagement Plan (SEP) for the South Sudan Public Financial Management and Institutional Strengthening Project (P176761). The SEP establishes the timing and methods of stakeholder engagement, project information dissemination and grievance management for the project. The SEP aims to ensure that stakeholder engagement is timely and meaningful through appropriate communication which fosters the development of strong and constructive relationships with stakeholders who are impacted by, have special interests in or may influence the project. Stakeholder engagement is an important tool for social inclusion and reducing inequalities. Effective stakeholder engagement ensures that stakeholder views are incorporated into the project's design which is integral to the successful management of the project's environmental and social risks and the overall successful implementation of the project.

Implementation of this SEP is the responsibility of the Ministry of Finance and Planning (MOFP). The scope of the SEP is proportionate to the nature and scale of the project's potential risks and impacts. The SEP is a living document and will be updated, as necessary, throughout the project's life cycle.

1.1 Legislative and Policy Requirements

The South Sudan Access to Information Act No. 65 of 2013 states 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 Recipient 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 must be meaningful and 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.

1.2 Objectives of the Stakeholder Engagement Plan

The specific objectives of the SEP are:

1. To build and maintain a constructive relationship with stakeholders;
2. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account throughout the project cycle;
3. To promote and provide means for effective and inclusive engagement with stakeholders throughout the project life cycle on issues that could potentially affect them; and
4. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

2 Project Description

The uncertain and volatile political context of South Sudan dictates what is possible, determining the uneven trajectory of PFM reforms. The project approach and design draw on lessons learned from PFM and civil service reform efforts in other Fragility Conflict and Violence (FCV)-affected countries. The project will focus on creating windows of improved management of public finances, identifying and putting in place practical tools to mitigate uncertainty for priority spending areas, and improving discipline, transparency and predictability of budget preparation and implementation in key spending areas. The proposed project will also support implementation of these improvements in focus sectors. The project will build the capacity of the civil service in PFM and procurement at the central level and in four focus sectors to better manage funds, improve accountability, and develop and strengthen channels of communication between the government and its citizens. The project team is adopting an agile and flexible approach to design and implementation of the interventions, along with on-the-ground project management.

2.1 Project Development Objective (PDO)

The PDO for the project is to strengthen the (i) predictability and transparency of core budget processes for priority spending areas, and (ii) capacity in focus sectors to implement and manage foundational PFM functions. This will be achieved through four components as outlined in the following section.

2.2 Project Components

Component 1: Strengthening budget formulation processes

This component will support the establishment of a budget formulation process with adequate arrangements, processes, and tools over time to support timely and orderly resource allocation and contribute to the enabling environment for improved service delivery in focus sectors.

Subcomponent 1.1- Building the quality and transparency of the budget formulation process

Through this subcomponent, the MOFP will develop and strengthen the core underlying elements and functions needed to improve over time the accuracy and timeliness of budget formulation and better inform the allocation of funds in priority spending areas.

Subcomponent 1.2. Strengthening budget formulation in focus sectors

This subcomponent will support up to four focus sectors to build and strengthen budget processes.

Component 2: Strengthening the transparency and predictability of budget implementation and procurement for priority spending areas.

Through this component, the Government will strengthen its ability to make timely payments for priority spending areas, including salaries and service delivery sectors, as well as to report on and manage expenditures.

Subcomponent 2.1. Streamlining and improving budget implementation processes and systems

Through this subcomponent, the MOFP and focus sectors will adopt tools, procedures and systems needed to support improvements to the predictable and transparent implementation of the budget and better management and reporting of funds. This subcomponent will strengthen the Government's capacity to manage cash and make predictable, stable salary payments and transfers, thereby supporting the more timely release of funds for priority spending areas.

Subcomponent 2.2. Improving oversight and accountability of funds transferred to subnational government entities

This subcomponent will augment external support currently being provided by the United Nations Children’s Fund (UNICEF) to strengthen the State Transfer Monitoring Committee (STMC) and the Intergovernmental Fiscal Unit in the MOFP.

Subcomponent 2.3. Strengthening public procurement

This subcomponent will strengthen the public procurement system.

Component 3: Supporting institutions, capacity development and facilitating change for PFM reform

The objective of this component is to strengthen the institutional and human capacity of the Government to manage PFM reforms. This cross-cutting component will establish the foundations of PFM capacity for civil servants in the MOFP and focus sectors. It will help the government to create an environment that encourages learning through capacity building, change management, as well as engagement with citizens and other stakeholders.

Subcomponent 3.1. Supporting institutions and capacity development

This subcomponent will seek to strengthen the PFM institutional and human capabilities of the civil service in the MOFP and focus sectors.

Subcomponent 3.2. Facilitating change and stimulating demand for PFM reform

This subcomponent will support change management and citizen engagement to ensure that project interventions are internalized and effectively utilized by the public sector and the citizens.

Component 4: Project management and learning

This component will support the management, coordination, and monitoring and evaluation (M&E) of project activities and funds.

3 Previous Stakeholder Engagement Activities

Workshops and consultations on the project design and planned activities and implementation arrangements have been conducted with the following key stakeholders: Undersecretaries of the Ministry of Finance and Planning and the Ministry of Public Service; Director Generals, directors and technical staff from the MOFP’s Directorates of Accounts, Aid Coordination, Budget, Debt Management, IFMIS, Intergovernmental Fiscal, Internal Audit Macro-fiscal, Procurement, Revenue and Treasury and from the Ministry of Public Service; technical staff from the Ministries of Health and Defence and Veterans Affairs; directors and technical staff from the Central Equatoria State Ministry of Finance; directors and technical staff from the National Audit Chamber (NAC); the Local Government Board; and the University of Juba. A total of 7 workshops were conducted between August 2021 and January 2022 with approximately 80 participants. Project design has benefitted from numerous rounds of discussions with key members of the above-mentioned MOFP Directorates and other MDAs, in addition to the workshops.

4 Stakeholder Identification and Analysis

Project stakeholders can be divided into two broad groups- project affected parties and other interested parties. The following sections outline the stakeholders which make up these two broad groupings.

4.1 Project Affected Parties

These are stakeholders who will either be directly or indirectly impacted by the project.

Table 4.1- Project affected parties

Project Affected Party	Component	Interest
Government Ministries and Line Agencies – including, but not limited to: MOFP, Ministry of Agriculture and Food Security (MAFS), Ministry of General Education and Instruction (MOGEI), Ministry of Gender, Child and Social Welfare (at national, county, Boma and Payam levels) National Revenue Authority, Public Accounts Committee (PAC), National Audit Chamber (NAC) South Sudan Anticorruption Commission (SSACC)	All project components	The MOFP will be the implementing agency for the project and will establish a Project Management Unit (PMU). Government Ministries and line agencies will also directly benefit from the improvements to PFM and capacity building that will be implemented under the project. Disaggregation of data along gender lines will also directly benefit the Ministry of Gender, Child and Social Welfare in carrying out its mandate.
Civil Service Employees	All project components	The project will directly improve the PFM capacity of a number of public sector employees. Additionally, it will help to ensure that salaries are paid. The improvement of the systems and tools within the MOFP will ensure that salary payments and transfers are stable and released in a timely fashion.
CSOs working on financial transparency and governance	All project components	Improved PFM functions by government will ensure that the work for this group of project stakeholders can be undertaken in a more systemic and stable manner.
County level government	All project components	Positively impacted by the improved efficiency of the Government of South Sudan (GOSS) as a result of the project.
Boma and Payam level	All project components	Positively impacted by the improved efficiency of the GOSS as a result of the project.
Citizens of South Sudan	All project components	The general citizenry of South Sudan will be positively affected by improved economic benefits of the efficiency gains that will be made by the GOSS as a result of the project.
Vulnerable Groups	All project components	Vulnerable groups in South Sudan will benefit from the improved efficiency of the GOSS as a result of the project.

4.2 Other Interested Parties

These are stakeholders who have an interest in the project activities or outcomes.

Table 4.2- Other interested parties

Other Interested Parties	Interest
Government Ministries and line agencies not directly involved in the project	All will have an interest in the success of the project as it will also improve their ability to provide services.
Local businesses who are contracted by the GOSS	Interested in the improved efficiency of the GOSS PFM capacity as a result of the project. The project will contribute to improved stability of the payments made to them by GOSS.
International and local level NGOs, CSOs operating in agriculture and education	Interested in the benefits that will be accrued by the MAFS and MOGEI.
UN agencies and other development partners working in the project location	Would be interested in the success of the project's objectives. Would help to reduce some of their input into GOSS functions.
Academia and research institutions	Possibly could provide capacity building and training.
Women's Groups	Interested in the disaggregation of data by gender and training for female civil servants under the project.

4.3 Disadvantaged/ Vulnerable Groups

These are stakeholders who, by virtue of their circumstances are considered to face challenges in participation or in accessing project information, activities and or benefits. There are a variety of vulnerable groups relevant to the project in South Sudan. These include women, internally displaced persons (IDPs), public sector employees owed back salaries, youth, minority ethnic groups, returnees, persons with disabilities, orphans and child-headed households and people living with HIV/Aids. To ensure that they are consulted about the project and the benefits it will bring, special considerations will be taken into account for their consultation. These include, inter alia, ensuring that materials and consultations are held in local languages as needed, hosting separate consultations for some groups, providing child-care, working through Payam Development Committees (PDCs) and Boma Development Committees (BDCs) and other local community representatives to identify and mobilise minority groups to participate in meetings and consultations, and host any in-person consultations in venues that have access for persons with disabilities.

Vulnerable groups will be further confirmed and consulted through dedicated means designed in the communication plan for the project, as appropriate. A description of the methods of engagement that will be undertaken by the project is provided in the following sections.

Table 4.3- Summary of 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 Level¹	Government Ministries and Line Agencies directly involved/ impacted by project	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	Interested Party	English	Memo/letter, email, telephone calls	Meetings on at least semi-annual basis, Hand-outs.
	UN organizations and other development partners	Interested Party	English	Email, telephone & radio	Engage regularly about project updates.
	National NGOs, international NGOs	Interested Party	English	Email communication	Engage regularly about project updates.
State Level	Business community	Potentially Influencing Party	English	Email, telephone & radio	Contact should be established at least on a bi-annual basis
County Level	Members of the County Coordination Committee	Potentially Influencing Party	English and locally applicable languages	Email, telephone & radio	This is an important committee to ensure consultation of the project in the Bomas and Payams run smoothly. Contact should be initiated regularly implementation
	County Government	Potentially Influencing Party	English and locally applicable languages	Email, telephone & radio	Need information sharing for smooth implementation. Contact should be initiated regularly during implementation
Boma and Payam Level²	Members of the BDCs and PDCs	Potentially Influencing Party	English and locally applicable languages	Telephone calls/ word of mouth & radio	Very important body - link between the community, the county and development partners. Contact should be regularly during implementation.
	Traditional leadership and local religious leaders	Potentially Influencing Party	Locally applicable languages	Email, telephone & radio	Regular contact, during implementation

¹ 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.

² COVID-19 will impact the feasibility of in-person meetings. The project will implement provisions on prevention of spreading the virus in line with WHO guidance and following also government instructions. The Project will also seek to learn from *consultations-good practice under COVID-19* from World Bank and other sources and implement them accordingly.

Community	Stakeholder Group	Key Characteristics	Language requirements	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child-care, daytime meetings etc.)
	Women	Vulnerable Group	Locally applicable languages	Word of mouth	Separate meeting times, child -are.
	Girls	Vulnerable Group	Locally applicable languages	Word of mouth	Separate meetings/ after school.
	Youth	Vulnerable Group	Locally applicable languages	Word of mouth	Separate meetings/after school
	IDPs and Returnees	Vulnerable Group	Locally applicable languages	Word of mouth	May find that their place of origin or home is occupied by other people
	Ethnic minority groups	Vulnerable Group	English and locally applicable languages – in particular language of the minority group	Word of mouth	Can be contacted via other members of their community.
	People with disabilities	Vulnerable Group	Locally applicable languages	Word of mouth and engagement with community officers	Venues with access for persons with disabilities
	General community members	Potentially Influencing Party	Locally applicable languages	Word of mouth, notice board	Need to have clear information dissemination in order to be inclusive

5 Stakeholder Engagement Program

The purpose of stakeholder engagement is to ensure that all parties, groups, individuals and institutions who have direct and indirect stake in the project receive full and timely information and consultations to allow them the opportunity to express views, comments and feedback on the project development goals and implementation phases. Hence, this stakeholder engagement plan for this project is prepared to ensure that direct and indirect stakeholders at all levels informed about the project design and components, target beneficiaries consultation and engagement throughout the project phases. The engagement program includes methods of information and disclosure about the project design, proposed activities and components, target population consultation, annual project review meetings, quarterly community interface meetings, and regular project monitoring and supervision and complaint and grievance handling and resolution methods and procedures. The platforms are viewed to provide avenues for exchange of information between project implementers and stakeholders regarding the progress of the project and to address issues related to management of environmental and social risks including the grievance redress mechanism.

The project will utilize a multi-stakeholder engagement process that will be completed throughout the project's life cycle. Stakeholder engagement will be completed using both public consultation and information disclosure throughout the three stages of the project- design, implementation and closure/operations.

5.1 Proposed Strategy for Information Disclosure

Information to be provided to stakeholders depends on the stage of the project and with identified information needs of stakeholder. These include information on the nature of the project design, target beneficiaries, anticipated environmental and social risks and impacts, proposed mitigation measures and grievance redress channels and mechanisms.

Different methods will be used to disclose information to project stakeholders. The information will be disclosed in an effort to allow stakeholders to understand the project's risks and impacts and potential opportunities for their inclusion. Information will be disclosed on the websites of the Ministry of Finance Planning and the World Bank, on social media and in local offices in a manner that is accessible and culturally appropriate, taking into account the needs of any vulnerable groups (Table 5.1).

Table 5.1-Strategy for information disclosure

Project stage	Information to be disclosed	Method proposed	Timetable: Locations /dates	Target Stakeholders	Percentage reached	Responsibility
Preparation	Environmental and Social Commitment Plan (ESCP),	Government website, email, stakeholder meetings	During project preparation	All	TBD	MOFP
	SEP with GRM	Government website, email stakeholder meetings, social media, community bulletin board, free mobile phone	During project preparation	All	TBD	MOFP
	Labour Management Procedures with GRM	Government website	During project preparation	All	TBD	MOFP
Implementation	Disclosure of GRM	Government Website, Email, radio news, local TV spots, flyers stakeholder meetings, social media, community bulletin boards, phone	Continuous during implementation	All	TBD	MOFP
	Project-related information (progress, activities etc)	Government website, email, radio news, local tv spots, flyers, stakeholder meetings, social media, community bulletin boards, phone	Continuous during project implementation as activities commence and conclude	All	TBD	MOFP

Project stage	Information to be disclosed	Method proposed	Timetable: Locations /dates	Target Stakeholders	Percentage reached	Responsibility
	Project Reports	Government website, email, stakeholder meetings, social media, radio news, phone	Bi-annually during project implementation	All	TBD	
Operational	Project activities completed and benefits	Websites, radio news, local tv spots, social media email, stakeholder meetings, phone	On completion of all project activities	All	TBD	MOFP

5.2 Proposed Strategy for Consultation

This plan lays out the overall consultative processes of the project with its different stakeholders. The Project use various technics and tools to adequately engage various stakeholders. The project will ensure that these tools and methods fulfil the requirements of the SEP 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 COVID-19 crisis requires short-term adaptation of the consultation approach, while at the same time consultations are essential for the project implementation. The project will follow thereby (i) WHO guidance on prevention of the spread of the COVID-19 virus; (ii) respective instructions by the Government of South Sudan; while (iii) seeking also international good-practice on consultations under COVID-19 and innovative approaches established by World Bank, UN, and other development agencies. This can include Talking Books, radio programs combined with call-in-feedback, telegrams, what's apps ,small-group discussions once allowed with provision of PPE, and applying COVID protocols.

Hence, a result of the COVID-19 pandemic, consultations might need to be confined to the virtual space via technology such as Zoom or Facebook Live, as possible. In instances where virtual consultations are not feasible (e.g. there is limited or no access to internet, persons cannot use the technology or persons are not interested in using the technology) small face-to-face focus groups or meetings will be held . These meetings will follow national guidelines relating to the number restrictions on public gatherings. These meetings/focus groups will also ensure that proper COVID-19 transmission prevention protocols are adhered to, including the wearing of masks, the use of hand sanitizer/hand washing upon entry, social distancing etc. Other methods of consultation could include WhatsApp messaging, SMS, direct phone calls or the completion of surveys. The latter will also ensure strict adherence to COVID-19 transmission prevention strategies (Table 5.2).

Table 5.2- Strategy for consultation

Project stage	Purpose of engagement activity	Method used	Timetable: Location and dates	Target Stakeholders	Responsibility
Preparation	Consult ESF instruments and project GRM	Virtual or in person consultations availability on the website Email, social media, phone	During project preparation	All- special focus on integrating the views of representatives of vulnerable groups	MOFP
	Consult on ESF instruments	Virtual consultations using Zoom Facebook Live etc. Small focus group-type meetings where virtual consultations not feasible WhatsApp Messages Phone Surveys Email	On a continuous basis during project implementation	All	MOFP
	Promoting greater access of vulnerable groups to project activities	Public consultations (virtual where possible) Small focus group-type meetings where virtual not feasible WhatsApp Messages Phone Surveys Email	Every six months to evaluate and get feedback.	Vulnerable groups	MOFP
Implementation	Monitoring of the implementation of ESF instruments, Citizen Engagement	In-situ visit, Virtual meetings Small focus group-type meetings where virtual not feasible WhatsApp Messages Phone Calls Surveys Email	On a continuous basis during project implementation	All	MOFP

Project stage	Purpose of engagement activity	Method used	Timetable: Location and dates	Target Stakeholders	Responsibility
	and GRM				

5.3 Proposed Strategy to Incorporate the Views of the Vulnerable/ Disadvantaged Groups

The project will ensure that women and other vulnerable groups are participating in consultative processes and that their voices are not ignored. This may require specific meetings with some of the above identified vulnerable groups at the community level, in addition to general community consultations. For example, women may be more outspoken in women-only consultation meetings than in general community meetings. Similarly, separate meetings will be held with young people or with other groups for specific project activities. It is important to also rely on other consultation methods that 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 will visit households of vulnerable people, in particular 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 to the decision-making process should be encouraged, especially in governmental or traditional committees predominantly consisting of men.

5.4 Stakeholder Feedback

Feedback from stakeholders will be solicited at every stage of the project life cycle. For meetings/focus groups (whether virtual or in person), comments will be recorded through detailed meeting minutes. Additionally, the Social Safeguards Specialist in the PMU will be responsible for receiving and recording any queries, concerns or complaints against the project. Comments and decisions made on comments will be collated and reported back to stakeholders once the final decision on the course of action related to the comments has been made. Records will also be maintained on the methods used to inform stakeholders on dates and/or locations where they can gather project information and provide feedback.

In addition, stakeholders will be allowed to file complaints against the project through the Grievance Redress Mechanism (GRM) detailed in Section 6. All records relating to this mechanism, including grievance forms, grievance log, notes, interviews, meeting minutes, release forms etc. will also be stored.

5.5 Timelines

The project will be implemented from 2022 until December 2026. The stakeholder consultations shall be conducted throughout the project lifecycle. Information disclosure and consultations during project implementation will include regular visits and meetings with community leaders and regular meetings with *payam* / county authorities.

Reviews of Comments

The PMU, in the implementation of the project will gather all comments and inputs coming from community meetings, SMS, GRM outcomes, surveys and FGDs. The information gathered will be 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 will be 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.

5.6 Future Phases of the Project

As the project progresses, stakeholders, including the general public, will continually be informed about its milestones. This information includes disclosure on the project’s environmental and social performance, the implementation of the stakeholder engagement plan and the status of the grievance redress mechanism. These reports will be completed on at least a bi-annual basis.

5.7 Resources and Responsibilities for Implementing Stakeholder Engagement Activities

5.7.1 Roles and Responsibilities

Implementation and monitoring of the SEP and the other ESF instruments will be the responsibility of each implementing agency, that is the Ministry of Finance and Planning. For this, the MOFP will establish a Project Management Unit (PMU) and engage one Environmental and one Social Safeguards (shared with the South Sudan Enhancing Community Resilience and Local Governance Project Phase II (ECRP-II, P177093)) within one month of project effectiveness. The Social Safeguards Specialist will be directly responsible for informing staff from the various entities involved in the project implementation of all of the procedures included in the SEP. Further, the Social Safeguards Specialist will be responsible for tracking and recording the implementation of the SEP and its GRM.

Table 5.3- Roles and responsibilities for stakeholder engagement

Role/Position Title	Responsibilities
Project Manager Social Safeguards Specialist	<ul style="list-style-type: none"> • Manage and implement the Stakeholder Engagement Plan (SEP) • Dissemination of project information
Social Safeguards Specialist	<ul style="list-style-type: none"> • Interface with stakeholders and respond to comments or questions about the project or consultation process. • Provide contact information if stakeholders have questions or comments about the project or consultation process. • Document any interactions with external stakeholders. • Maintain database, records for SEP • Coordinate public meetings, workshops, focus groups etc. • Ensure the SEP is being adhered to and followed correctly. • Raise awareness of the SEP among project implementation unit, employees contracted firms and relevant external stakeholders. • Manage and monitor the project GRM

5.7.2 Resources

The project shall allocate an indicative amount of budget/funds to facilitate stakeholder engagement and grievance redress mechanism for the entire project period. The budget shall be adequate to cover costs of the stakeholder-planned engagement in all project phases and grievance

redressing activities. The following is an indicative budget allocation for stakeholder engagement activities including GRM implementation.

#	Item	Amount (\$USD)
1	GRM implementation	100,000
2	Staff	Included in staff cost
3	Consultations	100,000
4	Information Production and Dissemination	100,000
5	Total (\$USD)	300000

6 Grievance Redress Mechanism

While considerable efforts have been made to include safeguards in the design and implementation of the project in order to minimize and prevent potential adverse impacts, there is always a possibility that interests of some individuals, groups and institutions may still be negatively affected by the activities of the project. Hence, a well-defined, clear and transparent system for receiving, recording and resolving potential concerns and complaints shall be established for the project. A well-organized and well-functioning grievance redressing system is an essential and necessary mechanism to provide remedies to grievances presented by project affected people early enough to avoid unnecessary project implementation delays and obstructions.

Under the World Bank ESSs³, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.⁴ One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances’.⁵ The Project GRM should facilitate the project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The GRM needs to address concerns effectively and in a timely and transparent manner. It needs to be readily accessible for all project-affected parties and does not prevent access to judicial and administrative remedies. It needs to be designed in a culturally appropriate way and is able to respond to all the needs and concerns of project-affected parties.

³ World Bank, Environmental and Social Framework, 2018.

⁴ 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’⁴ spells out requirements for a GBV grievance redress mechanisms, which is laid out in a separate GBV/SEA and Child Protection Risks Action Plan.

⁵ World Bank, 2018, p. 131.

6.1 Key activities in the grievance redress process

The GRM process for SEP of this project will consist of five key activities, which will be performed in managing the grievances for the project. These key activities include:

- 1) Complaint uptake
- 2) Complaint assessment and analysis
- 3) Resolution and closure
- 4) Grievance Registry
- 5) GRM Monitoring and Evaluation

6.2 World Bank Grievance Redress Service

The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment. The World Bank GRS can be found at the following URL link: <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

Complaints must be completed in writing and addressed to the GRS. They can be submitted using the following methods:

1. Online, by completing the online form:
<https://pubdocs.worldbank.org/en/743201426857500569/Grievance-Redress-Service-GRS-complaint-form.docx>
2. By email to grievances@worldbank.org
3. By letter or by hand delivery to the World Bank Headquarters in Washington D.C., United States or any World Bank Country Office- printing and using this form:

<https://pubdocs.worldbank.org/en/743201426857500569/Grievance-Redress-Service-GRS-complaint-form.docx>

6.3 Addressing Gender Based Violence and Sexual Exploitation and Abuse

The GRM will specify an individual(preferably a woman) who will be responsible for dealing with any gender-based violence (GBV) or sexual exploitation and abuse (SEA) issues, should they arise. A list of GBV and SEA service providers will be kept available by the project. The GRM should assist GBV / SEA survivors by referring them to GBV/SEA Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

If a GBV related incident occurs, it will be reported through the GRM, as appropriate and keeping the survivor information confidential. Specifically, the GRM will only record the following information related to the GBV complaint:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of their knowledge, the perpetrator was associated with the project; and,

- If possible, the age and sex of the survivor.

Any cases of GBV brought through the GRM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. Here, the GRM will primarily serve to:

- Refer complainants to the GBV Services Provider; and
- Record the resolution of the complaint

The GRM will also immediately notify both the Implementing Agency and the World Bank of any GBV/SEA complaints **WITH THE CONSENT OF THE SURVIVOR**.

6.4 Monitoring and Reporting

The Social Safeguards Specialist will prepare the Monthly and Quarterly Reports on the grievance issues received by the project and contribute to the bi-annual project progress reports.

7 Reporting Back to Stakeholder Groups

Results of stakeholder engagements will be reported back to the affected communities, as well as the relevant local authorities and other stakeholders through bi-annual project reports produced by MOFP. It will be the responsibility of the PMU to ensure that all relevant reporting is shared through the above defined public means. The reporting will include feedback on how stakeholders' concerns are being addressed, and they and all stakeholders will be reminded of the availability of the GRM in case of any issues arising from the reporting.