Republic of Sierra Leone
MINISTRY OF FINANCE

ECONOMIC DIVERSIFICATION PROJECT
(EDP)

Resettlement Policy Framework (RPF)

Final Report

24th January 2020
Contents

GLOSSARY ........................................................................................................................................ IV

EXECUTIVE SUMMARY ...................................................................................................................... V

1.0 INTRODUCTION .............................................................................................................................. 1

1.1 Potential Intervention Sites and Activities .................................................................................. 3

1.2 Institutional Arrangement for Project Implementation ............................................................... 4

2.0 OBJECTIVES AND PRINCIPLES OF THE RPF ............................................................................. 5

2.1 Purpose/Objectives of the RPF ..................................................................................................... 5

2.2 Scope of the RPF ........................................................................................................................... 5

3.0 METHODOLOGY AND APPROACH ............................................................................................... 7

3.1 Literature Review ....................................................................................................................... 7

3.2 Stakeholder Consultations ........................................................................................................... 7

3.3 Data Collation, Analysis and Preparation of Report ...................................................................... 8

4.0 BASELINE SOCIO-ECONOMIC DATA ........................................................................................... 9

5.0 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK ................................................................. 11

5.1 Relevant National Regulatory Framework on Land and Compensation ..................................... 11

5.1.1 The Constitution of Sierra Leone (1991) and the Protection of Individual Property ............... 11

5.1.2 National Tourism Policy ........................................................................................................ 11

5.1.3 National Lands Policy (2015) ................................................................................................ 12

5.1.4 National Environmental Policy (1994) and Cultural Heritage Issues .................................... 13

5.1.5 The Local Government Act, 2004 ......................................................................................... 13

5.2 Land Ownership and Tenure System ......................................................................................... 14

5.3 World Bank Safeguard Policy on Involuntary Resettlement ....................................................... 14

5.3.1 Procedures for Involuntary Resettlement according to World Bank OP 4.12 ....................... 14

5.3.2 Comparison of Sierra Leonean Regulations and World Bank Policies ................................ 15

6.0 ELIGIBILITY CRITERIA AND ENTITLEMENT MATRIX ............................................................... 18

6.1 Potential Adverse Impacts on Assets and Livelihoods ................................................................ 18

6.2 Generic Project Impacts on Assets and Livelihoods .................................................................. 18

6.2.1 Categorization of impacts by type of sub-projects ................................................................ 18

6.3 Principles, Objectives and the Resettlement Process .................................................................. 25

6.4 Objectives of the Resettlement/Compensation Programme ....................................................... 27

6.5 Resettlement Processes .............................................................................................................. 27

6.5.1 Overview of the Resettlement Preparation Process ................................................................. 28

7.0 PROPERTY VALUATION AND COMPENSATION ........................................................................ 30

7.1 Valuation of Properties .............................................................................................................. 30

7.1.1 Basis of Valuation .................................................................................................................. 30

7.1.2 Valuation Methods and Compensation Rates ....................................................................... 30

7.1.3 Valuation Responsibility ....................................................................................................... 31

7.2 Other Considerations into the Compensation Package ............................................................ 31
7.3 TYPES OF COMPENSATION ........................................................................................................... 32
7.4 COMPENSATION PAYMENT/CLAIM ............................................................................................ 32

8.0 IMPLEMENTATION ARRANGEMENTS AND RESPONSIBILITIES FOR RESETTLEMENT .......... 33

8.1 INSTITUTIONAL RESPONSIBILITIES .......................................................................................... 33
8.2 RESOURCES, TECHNICAL SUPPORT AND CAPACITY ENHANCEMENT .................................. 34
  8.2.1 Resources available to deal with resettlement issues .............................................................. 34
  8.2.2 Technical support and capacity building ................................................................................. 34
8.3 PRIORITY TASKS ............................................................................................................................ 34
8.4 PREPARATION OF ARAPs/ARPs AND SETTING UP OF RESETTLEMENT MANAGEMENT TEAMS .................................................................................................................. 35

9.0 GRIEVANCE REDRESS MECHANISM ......................................................................................... 36

9.1 OBJECTIVE .................................................................................................................................. 36
9.2 POTENTIAL SOURCES OF GRIEVANCES/DISPUTES ................................................................ 36
9.3 THE GRIEVANCE REDRESS PROCESS ...................................................................................... 37
  9.3.1 Registration/Receipts of complaints ....................................................................................... 37
  9.3.2 Determining and implementing the redress action ................................................................. 37
  9.3.3 Verifying the redress action .................................................................................................... 38
  9.3.4 Monitoring and Evaluation ..................................................................................................... 38
  9.3.5 Dissatisfaction and Additional Steps ...................................................................................... 38
9.4 MEMBERSHIP, FUNCTION AND FINANCING OF THE GRT ....................................................... 38
9.5 SCHEDULE TEMPLATE FOR GRIEVANCE REDRESS AND INSTITUTIONAL RESPONSIBILITIES. ................................................................................................................................... 39

10.0 STAKEHOLDER CONSULTATIONS, PARTICIPATION AND PUBLIC DISCLOSURE .................. 40

10.1 STAKEHOLDER CONSULTATIONS CARRIED OUT .................................................................... 40
10.2 CONSULTATION AND DISCLOSURE REQUIREMENTS FOR THE RESETTLEMENT POLICY FRAMEWORK ................................................................................................................. 41
10.3 COMMUNITY CONSULTATION AND CITIZEN’S ENGAGEMENT STRATEGY ............................... 41
10.4 IDENTIFICATION OF VULNERABLE GROUPS ............................................................................ 46
10.5 ASSISTANCE TO VULNERABLE PEOPLE ................................................................................. 46
10.6 PROVISIONS TO BE MADE IN RAPs/ARPs ............................................................................... 46

11.0 BUDGET AND FUNDING ............................................................................................................. 48

11.1 ESTIMATED BUDGET TO IMPLEMENT RPF ............................................................................. 48
11.2 BUDGET FOR PREPARATION AND IMPLEMENTATION OF RAPs/ARAPs ................................. 48
11.3 SOURCES AND ARRANGEMENTS FOR FUNDING ..................................................................... 50

12.0 MONITORING AND EVALUATION ............................................................................................. 51

12.1 OBJECTIVES OF MONITORING AND EVALUATION ................................................................. 51
12.2 INTERNAL MONITORING .......................................................................................................... 51
  12.2.1 Scope and Content ................................................................................................................. 51
  12.2.2 Monitoring indicators .......................................................................................................... 51
12.3 INTERNAL EVALUATION ............................................................................................................ 52
  12.3.1 Evaluation objectives ............................................................................................................ 52
12.4 EXTERNAL MONITORING AND EVALUATION ......................................................................... 52
12.5 COMPLETION AUDIT ................................................................................................................ 53
List of Tables

Table 1: Comparison of Sierra Leonean Regulations with World Bank Policies ........................................ 15
Table 2: Generic potential project activities and likely impacts on Assets and Livelihoods ................... 20
Table 3: Eligibility Criteria and Entitlements .................................................................................................. 22
Table 4: General guidelines and methods for costs preparation ........................................................................ 31
Table 5: Institutional framework ...................................................................................................................... 33
Table 6: Schedule template for Grievance Redress ...................................................................................... 39
Table 7: Some key organizations/communities engaged during May 2018 and May 2019 for the RPF .......... 40
Table 9: Estimated Budget for RPF Implementation ..................................................................................... 48
Table 10: Itemization of budget ..................................................................................................................... 49
**GLOSSARY**

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ARAP</td>
<td>Abbreviated Resettlement Action Plan</td>
</tr>
<tr>
<td>CSO</td>
<td>Civil Society Organization</td>
</tr>
<tr>
<td>DSTI</td>
<td>Directorate of Science, Technology and Innovation</td>
</tr>
<tr>
<td>EDF</td>
<td>Economic Diversification Project</td>
</tr>
<tr>
<td>EPA-SL</td>
<td>Environmental Protection Agency, Sierra Leone</td>
</tr>
<tr>
<td>ESIA</td>
<td>Environmental and Social Impact Assessment</td>
</tr>
<tr>
<td>ESMF</td>
<td>Environmental and Social Management Framework</td>
</tr>
<tr>
<td>ESMP</td>
<td>Environmental and Social Management Plan</td>
</tr>
<tr>
<td>GBV</td>
<td>Gender Based Violence</td>
</tr>
<tr>
<td>GDP</td>
<td>Gross Domestic Product</td>
</tr>
<tr>
<td>GoSL</td>
<td>Government of Sierra Leone</td>
</tr>
<tr>
<td>GRM</td>
<td>Grievance Redress Mechanism</td>
</tr>
<tr>
<td>GRT</td>
<td>Grievance Redress Team</td>
</tr>
<tr>
<td>ITCZ</td>
<td>Inter Tropical Convergence Zone</td>
</tr>
<tr>
<td>NTB</td>
<td>National Tourist Board</td>
</tr>
<tr>
<td>MCA</td>
<td>Market Cost Approach</td>
</tr>
<tr>
<td>MLHE</td>
<td>Ministry of Lands, Housing and Environment</td>
</tr>
<tr>
<td>MLCPE</td>
<td>Ministry of Lands, Country Planning and Environment</td>
</tr>
<tr>
<td>MoF</td>
<td>Ministry of Finance</td>
</tr>
<tr>
<td>MTCA</td>
<td>Ministry of Tourism and Cultural Affairs</td>
</tr>
<tr>
<td>MTI</td>
<td>Ministry of Trade and Industry</td>
</tr>
<tr>
<td>MWPA</td>
<td>Ministry of Works and Public Assets</td>
</tr>
<tr>
<td>NGO</td>
<td>Non Governmental Organization</td>
</tr>
<tr>
<td>OARG</td>
<td>Office of the Administrator and Registrar General</td>
</tr>
<tr>
<td>ODK</td>
<td>Open Data Kit</td>
</tr>
<tr>
<td>PAP</td>
<td>Project Affected Person</td>
</tr>
<tr>
<td>PCU</td>
<td>Project Coordination Unit</td>
</tr>
<tr>
<td>PPE</td>
<td>Personal Protective Equipment</td>
</tr>
<tr>
<td>RAP</td>
<td>Resettlement Action Plan</td>
</tr>
<tr>
<td>RCA</td>
<td>Replacement Cost Approach</td>
</tr>
<tr>
<td>RPF</td>
<td>Resettlement Policy Framework</td>
</tr>
<tr>
<td>SLSTDTP</td>
<td>Sierra Leone Sustainable Tourism Development Project</td>
</tr>
<tr>
<td>SME</td>
<td>Small and Medium Scale Enterprises</td>
</tr>
<tr>
<td>SMEDA</td>
<td>Small and Medium Scale Enterprises Development Agency</td>
</tr>
<tr>
<td>STDP</td>
<td>Sustainable Tourism Development Project</td>
</tr>
<tr>
<td>RPF</td>
<td>Resettlement Policy Framework</td>
</tr>
<tr>
<td>WB</td>
<td>World Bank</td>
</tr>
</tbody>
</table>
EXECUTIVE SUMMARY

The objective of this Resettlement Policy Framework (RPF) is to update an initial report prepared for the Sustainable Tourist Development Project (STDP) so as to encompass the economic diversification agenda being espoused by the Government of Sierra Leone. With the expansion of the scope to include SME growth and development, the RPF for the Economic Development Project (EDP) provides the basis for assessing, analyzing and evaluating environmental and social impacts of both tourism and SME development related activities.

Project objective and components

The project objective is to facilitate investments and the growth of SMEs and entrepreneurship in Sierra Leone. At the end of the project, it is envisaged that the following indicators would have been met.

1. Improvement in the overall business enabling environment, as measured by the Ease of Doing Business Score;
2. Private sector investments leveraged through project activities, including investments in early-stage or risk financing for SMEs and start-ups supported by the project, in non-resource sectors;
3. Increase (additional) in average value of gross sales by firms supported by the project.

Accordingly, the project has three components by which it aims to achieve these indicators:

Component 1- Promoting business environment reforms and supporting their implementation:

Component 1.1. Formalization, Entrepreneurship: This aims at digitization and streamlining business registration and licensing procedures and public records
Component 1.2. Access to Finance and Financial Inclusion: This aims at strengthening credit reporting systems and facilitating secured transactions.
Component 1.3. Property Rights and Digital Records: Specific activities include: Digitalization of all existing property deeds and front-end website and Construction permits: Introduce legal reforms and IT systems to support reforms and streamline processes.

Component 2: Supporting the growth of SMEs and entrepreneurship: This component is aimed at supporting the growth and competitiveness of SMEs in non-mining based sectors, particularly in tourism and other service based sectors, to improve to improve productivity by addressing critical firm-level and sector-level constraints.

Component 2.1: Public Goods Intervention: These are public sector interventions that aim to unlock the potential of the private sector and facilitate increased private sector investment. Specifically, this sub component will finance the upgrade of physical infrastructure and build capacity among private and NGO actors:

Sub-Component 2.2. SME and Start Up Acceleration: This sub-component will provide integrated support services to capacity of growth-oriented SMEs and start-ups both in the formal and informal sectors. This activity will be delivered through SME incubation which will largely be delivered by existing incubator programs in the eco-system.

Sub-Component 2.3. Early Stage Financing: This subcomponent is targeted at improving access to finance for both growth-oriented SME and Start-ups for them to make investment necessary productivity-enhancing investments.
Component 3: Strengthening Public Policy and Project Supervision: This sub-component aims at strengthening Public Sector capacity in the design and implementation of policies that are relevant to economic diversification. Some activities include strengthening public policy capacity, monitoring and evaluation and project coordination.

Project intervention sites and activities
The project will upgrade the physical infrastructure (such as roads, buildings) at up to five (5) tourism related sites and also involve the construction of SME Solutions Centre or One Stop Shop. These activities may potentially impact on land and structures, cause physical relocation or economic displacement. The specific intervention sites are not yet determined at this stage and will be selected as part of the project implementation process. Once the tourism sites are selected, the communities, service providers and other relevant stakeholders will be involved in creating a participatory site management plan, which includes agreeing on development rules for the site, training needs and defining the specific works to be undertaken in each site. There will be a SME solution center in Freetown and also, one other Province yet to be identified. These interventions may require the acquisition of land for the construction of the facilities.

Objectives and Principle of the RPF
The purpose of the Resettlement Policy Framework (RPF) is to establish a comprehensive framework to guide and govern the entire EDP as mainly light civil works packages (such as construction of new buildings or rehabilitation of old buildings) are defined for funding. The RPF gives a statement of the policy, principles, institutional arrangements and procedures that the EDP will follow where the civil works will involve activities resulting in resettlement. The RPF clarifies the rules for identifying people who may be affected by the implementation of project activities and takes into account the requirements of the World Bank Policy OP 4.12, and the national laws and regulations of Sierra Leone that deals with Involuntary Resettlement.

The principle underpinning the preparation and implementation of the resettlement instrument is to minimize negative impacts and comprise:

- Compliance with regulatory framework;
- Minimization of physical and economic displacement;
- Issuance of Cut-off date;
- Income and livelihood restoration;
- Compensation payment prior to physical and economic displacement and at full replacement value;
- Hold meaningful consultations with all stakeholders;
- Grievance redress mechanisms; and
- Stakeholder Consultation and Public Disclosure of project related information.

Methodology and Approach
The RPF has been prepared in accordance with the applicable World Bank safeguard policy on involuntary resettlement (OP 4.12) and Sierra Leonean policies and laws relating to resettlement, land acquisition and compensation for loss of property. The preparation of the RPF involved (i) Literature review; (ii) Consultations with selected key stakeholders (sector institutions and communities); and (iii) Data collation, analysis and preparation of report.
The key stakeholders identified for consultation include the following:

**Project Implementers**
1. Ministry of Finance - Project Coordinating Unit
2. Ministry of Tourism and Cultural Affairs (MTCA) - National Tourist Board
3. Ministry of Trade and Industry - SME Development Agency
4. Directorate of Science, technology and Innovation

**Potential Project Beneficiaries**
5. Tourist communities (with emphasis on women and youth groups)
6. SME Solution Centers

Stakeholder consultation or engagement is a process and the PCU will continue with the engagement throughout the project implementation phase in collaboration with the respective District Councils, project communities as well as other state and non-state institutions. The outcome of the consultations is provided in the report which includes the strategy for citizen’s engagement.

**Legal and institutional framework for land acquisition and involuntary resettlement**
The relevant national environmental and other statutory laws and legislation particularly relevant to the project include the following:
- The Constitution of Sierra Leone (1991) and the Protection of Individual Property;
- National Tourism Policy
- National Lands Policy (2015);
- National Environmental Policy (1994); and

The national legal and institutional framework has been described in the main body of the report as well as the World Bank OP4.12 on involuntary resettlement. These have been subsequently compared and some measures proposed to bridge the gap between national laws and WB requirements are listed below. A table with more detailed comparison is given in the report.
- Compensation payments are to be done prior to displacement.
- Squatters are to be provided resettlement assistance and compensations for crops, trees and structures (but no compensation for land)
- Land tenants attract compensation irrespective of the legal recognition of their occupancy
- Particular attention to be paid to vulnerable groups, especially those below the poverty line, the landless, the elderly, women especially widows and single parent, children and the disabled.
- Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement, and
- Functional, effective, transparent and accessible grievance mechanisms to be established.

**Eligibility criteria and entitlements**
Project affected persons are described as persons affected by land acquisition, land occupation, relocation, or loss of income associated with the acquisition of land and/or other assets. Based on an understanding of the social structure of the rural and urban communities and the nature of the EDP activities, it is possible to suggest that the most likely project affected persons (PAPs) will comprise...
individuals, families, traditional authorities, communities as a whole. **Table below** presents the eligibility criteria and entitlement matrix for the general categories of impacts that could occur under the EDP.
Table E1: Eligibility Criteria and Entitlements

<table>
<thead>
<tr>
<th>Affected Assets</th>
<th>Type of impact</th>
<th>Entitled units</th>
<th>Eligibility criteria</th>
<th>Entitlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land</td>
<td>Permanent acquisition of land,</td>
<td>Landowner (individual, family, community/stool)</td>
<td>Owns the affected plot of land under Sierra Leonean laws including customary</td>
<td>1. in-kind compensation (land to land) for land-based displacement at a suitable location comparable to the previous land or better</td>
</tr>
<tr>
<td></td>
<td>(individual, family, community/stool)</td>
<td></td>
<td></td>
<td>2. Cash compensation for land determined by prevailing market rates where there is satisfactory demonstration of lack of adequate land or strong preference by the PAP.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3. Land replacement for community Lands or if unavailable, compensation be paid to the community with their full consultation and participation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4. Cash compensation covering all administrative, land registration and transfer fees</td>
</tr>
<tr>
<td></td>
<td>Temporary occupation of land</td>
<td>Landowner (individual, family, community/stool)</td>
<td>Owns the affected plot of land under Sierra Leonean laws including customary</td>
<td>1. Compensation (in cash or kind) for the period of occupation as agreed among the parties via negotiation.</td>
</tr>
<tr>
<td>Crops (food/cash crops</td>
<td>Destruction of/ damage to standing</td>
<td>Owner or Farmer</td>
<td>Have grown the affected crop (regardless of related plot ownership)</td>
<td>1. Cash compensation for standing crops counted at valuation date and based upon updated Survey Department rates,</td>
</tr>
<tr>
<td>and economic trees</td>
<td>crops</td>
<td></td>
<td></td>
<td>2. Cost of replanting to the same maturity level and</td>
</tr>
<tr>
<td></td>
<td>destruction to standing crops</td>
<td></td>
<td></td>
<td>2. Disturbance allowance of 10% of (1) or at a rate determined by MLHE.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3. to the extent feasible, allow for farmers to harvest crops before start of project interventions.</td>
</tr>
<tr>
<td>Structures</td>
<td>Destruction of immovable structures</td>
<td>Owner</td>
<td>Owns affected structure</td>
<td>1. Compensation at full replacement cost of structure including cost for the land except land is already compensated based on first column above.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2. Cost of moving (e.g. persons/ goods in the structure under or belonging to owner)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3. Disturbance allowance of 10% of (1) or at a rate determined by MLHE.</td>
</tr>
<tr>
<td>Affected Assets</td>
<td>Type of impact</td>
<td>Entitled units</td>
<td>Eligibility criteria</td>
<td>Entitlement</td>
</tr>
<tr>
<td>-----------------</td>
<td>----------------</td>
<td>----------------</td>
<td>----------------------</td>
<td>-------------</td>
</tr>
</tbody>
</table>
|                 |                | Occupant       | Live in or use the affected structure on rental basis (Occupant different from owner) | 1. Cost of renting similar structure (e.g. for 6 months’ duration)  
2. Cost of moving out to new place  
3. Disturbance allowance of 10% of (1) or at a rate determined by the MLHE |
|                 |                | Squatter       | Live in or use the affected structure as at time of census | 1. Compensation for full replacement cost of structure |
| Relocation of movable structures | Owner          | Owns the affected structure | 1. Cost of moving affected structure to new site (  
2. Disturbance allowance of 10% of (1) or at a rate determined by the MLHE |
|                 | Occupant       | Use or occupies the affected structure | 1. Cost of moving occupants to new site  
2. Disturbance allowance of 10% of (1) or at a rate determined by the MLHE [NB: if owner is same as occupant, he/she will not be entitled to this disturbance allowance] |
| Livelihoods     | Agriculture - destruction of economic or cash crops | Farmer          | Use affected land for farming as livelihood sources (emphasis on perennial crops. Annual crops can be harvested prior to land entry or destruction) | 1. Cash compensation for any temporary loss of income or livelihood incurred as a result of the project during the transition period (period required to re-establish farm elsewhere). |
|                 | Businesses      | Business person (may be distinct from owner of structure where business takes place) | Operate a business on Project affected land, regardless of the land ownership situation (includes squatters) | 1. Cash compensation of temporary loss of income or livelihood incurred because of the Project during the period required to re-establish the business to pre-Project conditions |
|                 | Use of communal resources such as livestock grazing grounds, | User of such resources (can be individuals or communities) | Use communal resources as an element of livelihood | 1. Assistance in identifying and accessing similar resources elsewhere  
2. Cash compensation of temporary loss of income incurred because of the Project during the period |
<table>
<thead>
<tr>
<th>Affected Assets</th>
<th>Type of impact</th>
<th>Entitled units</th>
<th>Eligibility criteria</th>
<th>Entitlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultural heritage resource (e.g. sacred site).</td>
<td>Relocation of or removal of cultural heritage resource located on project site</td>
<td>Owner (individual or community)</td>
<td>Use or pay homage to cultural heritage resource/ sacred site</td>
<td>Negotiate with owner or community with regard to rites to be performed to ensure successful relocation or removal of cultural resource/ sacred site in accordance with Chance Find procedures prescribed under the ESMF.</td>
</tr>
<tr>
<td>(or involuntary restrictions to community assets)</td>
<td></td>
<td></td>
<td></td>
<td>required to access similar resources elsewhere/period required to provide alternative livelihood assistance</td>
</tr>
</tbody>
</table>
Resettlement process

The resettlement preparation process will begin with screening of EDP subprojects/activities to determine if there is need for the preparation of any resettlement instrument (ARAP or RAP). A sample screening checklist for identifying cases of involuntary resettlement is provided in Annex 1. The number of affected people and potential impacts will determine whether the process is to include the preparation of a full RAP or of an Abbreviated Resettlement Action Plan (ARAP). The PCU will use the NTB and SMEDA safeguard focal persons for the screening activity and to determine the number of affected persons/assets under any EDP activity that is likely to generate resettlement related or compensation issue.

Upon identification of the need for involuntary resettlement in a sub-project, the project will carry out a census to identify the persons who will be affected by the sub-project. This will help the project to determine who will be eligible for assistance early enough in the project cycle. It will also help to prevent an inflow of ineligible people living outside the sub-project area of impact but who might want to take advantage and claim for assistance. The completion of the census will mark the cut off-date for eligibility for compensation. Annex 3 shows a framework for the census of affected assets and people. The services of ARAP/RAP consultants will be procured for the preparation of the action plans.

Consultations with stakeholders including PAPs will be an integral part in the ARAP or RAP preparation, implementation and monitoring processes at all stages and stakeholders should have access to the ARAP/RAP. Consultations would happen in local language as much as possible; women will be consulted separately if that is more appropriate. The consultation process would ensure sizeable participation of women, youth, and groups at risk of exclusion, and also ensure prior distribution of project information in a form that is accessible to community members, etc.

Guidelines and methods for cost preparation

The Table below provides the general guideline for cost preparation and method for valuing affected assets/properties. The Department of Housing under the Ministry of Land, Housing and Environment (MLHE) together with the Survey Department under the Ministry of Works and Public Assets (MWPA) which are the mandated institutions for property valuation, will be requested to value affected assets/properties based on the full replacement cost principle (which include transaction cost such as labour and transport cost). Certified private valuers may also be engaged where necessary.

<table>
<thead>
<tr>
<th>Item</th>
<th>Types</th>
<th>Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land</td>
<td>Community lands, private lands</td>
<td>Prevailing market value of the land to be acquired if there is a vibrant and active land market. Otherwise a negotiated price will be agreed including Land for land replacement</td>
</tr>
<tr>
<td>Structures</td>
<td>Any type of structure, e.g. mud houses, wooden structures, sandcrete block houses, etc</td>
<td>Full Replacement Cost method. No depreciation will be applied.</td>
</tr>
<tr>
<td>Crops/Plants</td>
<td>Food and cash crops/economic plants (cassava, maize, etc)</td>
<td>Enumeration approach and applying updated MLHE rates. Crop rates will take care of labor, agricultural inputs (including</td>
</tr>
</tbody>
</table>
Cultural heritage resources

| Cultural heritage resources | Sacred groves, cemeteries, shrines | 1. Option 1: Avoidance and an alternative site selected for project.
2. Option 2: Relocation of shrine and performance of necessary rituals/pacifications in consultation with the traditional authorities or community leaders.
3. Option 3: Other options proposed by community/PAPs and agreed upon under the project including the Chance Find procedure provided in the ESMF.

Loss of income and livelihood

| Loss of income and livelihood | Businesses, farming etc. | Estimation of net monthly/annual profit for business/farm based on records; application of net monthly/annual profit to the period when business/farm is not operating.
Livelihood Restoration Plan will be prepared as part of RAP/ARAP

Disturbance allowance

| Disturbance allowance | - | 5-10% of affected property value/compensation to be negotiated, based upon rates determined by the government agency for valuation.

Grievance redress mechanism and feedback

The project will set up a grievance redress mechanism. The general steps of the grievance process to be followed comprise:

- Registration/receipt of Complaints;
- Determining and Implementing the Redress Action;
- Verifying the Redress Action;
- Monitoring and Evaluation; and
- Dissatisfaction and Alternative Actions.

The table below presents a summary of the grievance redress procedure with institutional roles and responsibilities.

| Table E3: Schedule template for Grievance Redress |
|---|---|---|
| Steps | Process | Description |
| 1. | Grievance receipt and registration/logging | - Face to face; phone; letter, recorded during public/community meetings; recorded from Ward Committee, etc.
-Significance assessed and grievance recorded or logged using the model complaint form and filed. |
| | Development and implementation of response | - GRT meets or takes a decision on the grievance
-Grievance assigned to appropriate party for resolution if necessary
-Response development with input from relevant stakeholders
-Redress response/action approved by GRT and logged
-Redress response/update of progress on resolution communicated to the complainant
-Start implementing redress action |
<p>| | | Time frame |
| | | 1-2 Days |
| | | 5-10 Days |</p>
<table>
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<tr>
<th>Steps</th>
<th>Process</th>
<th>Description</th>
<th>Time frame</th>
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</table>
| 3     | Verifying the implementation of redress action | -Redress action implemented and verified by GRT.  
-GRT satisfied with implementation of redress action | 10-15 Days |
| 4     | Close grievance or refer grievance to 2nd tier resolution | -Completion of redress action recorded or logged  
-Confirm with complainant that grievance can be closed or determine what follow up is necessary  
-Record final sign off of grievance  
If grievance cannot be closed, return to step 2 or recommend 2nd level settlement | 15-25 Days |
| 5     | Court of law | -if 2nd level settlement does not address dispute, complainant can resort to court of law | Unknown |
| 6     | Monitoring and evaluation, and reporting | Grievance Redress Mechanism Process is documented and monitored | - |

For cases involving gender based violence, the GBV outreach staff proposed in the ESMF, and who will be stationed in project communities will intervene and ensure that satisfactory actions are taken to support survivors.

**Stakeholder consultations and Disclosure of the RPF**

The key stakeholders were engaged at various times and occasions to discuss resettlement issues that may arise from the implementation of the EDP. A report on the consultation is provided in the Annex 6 which includes the few concerns and issues raised by the various stakeholders. These have been incorporated in the report and possible mitigation measures have been included. The stakeholders were engaged within their respective communities and also in government institutions during May 2018 and also in May/June 2019. Generally, all the tourist communities sampled for consultation were pleased with the project intention and are confident that, given the necessary support, the community will be able to manage the tourist sites more efficiently to improve their living conditions. They are willing to provide land for the project and other needed assistance to bring the project to fruition. There are some Innovation Hubs already performing well in Freetown and which own other centers in the Provinces. The project will be of immense benefit to these Hubs through the proposed SME Solution centers and will enhance the entrepreneurial spirit of youth and women.

Further consultations and Public Disclosure will be undertaken by the PCU of the EDP and will be organized as follows:

- Circulation of the draft RPF for comments to all relevant institutions (e.g. PCU, relevant MTCA and MOTI directorates involved with the EDP, Ministry of Land, Housing and Environment (MLHE), Environmental Protection Agency, and the World Bank;  
- Communication of comments to the Consultant for incorporation into a final RPF, together with World Bank comments; and
Public Disclosure of final RPF (after reviewed and cleared by both GoSL & World Bank) both in-country (e.g. hard copies printed and lodged at relevant EPA offices, project communities, community libraries) and e-copies on the World Bank and Ministry of Finance websites.

Consultation and Citizen’s Engagement Strategy
As a matter of strategy, public consultation shall be an on-going activity taking place throughout the entire project cycle. Hence, community/public consultation will take place at the following stages as described in the tabular form in the main report: project inception and planning, screening process, feasibility study, preparation of project designs, resettlement and compensation planning, implementation of RAP/ARAP (drafting and reading/signing of the compensation contracts, payment of compensations, resettlement activities), and implementation of after-project community support activities.

Vulnerable persons
Vulnerable people to be considered under the EDP include (1) the elderly, usually from 70 years and above; (2) Widows; (3) Women and children; (4) Physically challenged persons; (5) Mentally challenged/highly depressed persons; (6) Affected Persons who are too ill, bedridden, hospitalized or stricken with HIV/AIDS; (7) Unemployed youth; (8) Female heads of households; and (9) Migrant/settlers without proper land documents.

Vulnerable persons will be identified at the census stage. Assistance to such persons may take various forms such as finding alternative sites for their activities, assistance in the post payment period to secure the compensation money and reduce risks of misuse/robbery etc. The kind of assistance may also depend upon vulnerable persons’ requests and specific needs.

Implementation arrangements for the RPF
The overall responsibility for steering the project lies with the Ministry of Finance. The main state institutions, National Tourist Board and SMEDA will have primary responsibility as implementing agencies for specific activities directly related to their areas of functional responsibility, in line with the project development objective. A Project Coordination Unit (PCU) will be established at the Ministry of Finance. The PCU will be responsible for coordinating and supervising the day-to-day implementation of the project including safeguard actions.

The implementation activities will be under the overall guidance of the PCU. The responsibilities of the various institutions are presented in the Table below.

Table E4: Institutional framework

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<th>No.</th>
<th>Institution</th>
<th>Responsibility</th>
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| 1.0 | Project Coordinating Unit | • Overall supervision of the RPF.  
• Trigger the process through screening and inventory of affected persons and assets and implement plan. |
| 2.0 | MTCA/ NTB MTI/ SMEDA | • Assist with screening of subprojects and initial identification of PAPs  
• To assist with compensation negotiations (in kind) where necessary |
3.0 Environmental Protection Agency (EPA)

- To assist in grievance redress matters
- Review screening reports and advise on level of environmental assessment if necessary
- Assist with training and capacity building of other institutions

4.0 Ministry of Land, Housing and Environment (MLHE)/ Ministry of Public Works and Assets

- To undertake the valuation of affected properties and compensation due PAPs.

5.0 District Council, Traditional authorities, Ward Committees

- To assist with community awareness creation, notifications and support in the inventory of affected persons and compensation related issues.
- To assist in grievance redress matters

6.0 Consultants/NGO

- Prepare ARAP/RAP if necessary and assist with implementation and capacity building. However, this at the discretion of the PCU since preparation of instruments is the responsibility of the GoSL.
- NGO to assist with grievance management

7.0 World Bank

- To provide guidance and safeguards implementation support

The Ministry of Finance has the overall responsibility for preparing the RPF and implementing same with World Bank approval. It will ensure that all compensation and resettlement related matters are carried out satisfactorily before the disbursement of funds for the project and rehabilitation/construction works commences.

The District Councils where tourist sites will be developed will facilitate community orientation to fully understand and appreciate the processes and assist in implementation. Much of the work will be done at the district council level, and the Ward Committees being the local administrative authority with the support from NTB will further ensure that:

- Communities are properly and adequately informed (timely) by the NTB of the Plans, and also their rights and options relating to their properties that may be affected by the project and the compensation issues if any.
- Activities between different communities implementing the resettlement or compensation related plans are properly coordinated.
- Any grievances submitted by the affected persons are attended to as appropriate.
- Provide regular updates about project implementation through periodic reports.

SMEDA will work with the Provincial authorities to select the location of the Solution centers and also the small and medium scale enterprises most suited for the project.

Where an ARAP or RAP is prepared for any EDP subproject/activity, Resettlement Management Teams will be proposed and included in the documents. The resettlement management teams may consist of three smaller teams namely:

- Compensation Team;
• Grievance Redress Team; and
• Monitoring and Evaluation Team.
However, depending on the number of affected persons and complexity of the issues, the Resettlement Management Team may provide all three services directly.

**Capacity building**
Compliance with World Bank policies needs some capacity building at the levels of both Project management (Project Coordination Unit) and Project implementers at the national and provincial/district level. A training programme is proposed as part of this RPF.

**Budget for implementation of RPF and preparation of ARAP/RAP**
The budget for the implementation of the RPF is estimated to be US$50,000 which includes the cost of setting up of GRM, training, sensitization and awareness creation programs, Public Disclosure and monitoring and evaluation and will be funded by the project. Considering the country’s debt stress, the project will also consider the options of obtaining waivers to use project funds for compensation payment.

Also, the cost for the preparation of the ARAP/ RAP will be derived from expenditures relating to (1) the preparation of the resettlement instrument, (2) relocation and transfer, (3) income losses and livelihood restoration plan, and (4) administrative costs.
1.0 INTRODUCTION

The Government of Sierra Leone, through the Ministry of Finance (MoF) is preparing the Economic Diversification Project with an estimated US$ 30 million financing from the International Development Association (IDA) of the World Bank Group.

The project objective is to facilitate investments and the growth of SMEs and entrepreneurship in Sierra Leone. At the end of the project, it is envisaged that the following result indicators would have been met.

1. Improvement in the overall business enabling environment, as measured by the Doing Business Ease of Doing Business Score;
2. Private sector investments leveraged through project activities, including investments in early-stage or risk financing for SMEs and start-ups supported by the project, in non-resource sectors;
3. Increase (additional) in average value of gross sales by firms supported by the project;

Accordingly, the project has three components by which it aims to achieve these result indicators:

Component 1- Promoting business environment reforms and supporting their implementation: The component is aimed at providing technical assistance to key Government Ministries and Agency and Department to streamline processes including digitization, strengthen regulatory environment and build key functional capacity to ensure reforms and new processes are sustained and effectively implemented. Specifically, this component will include the following activities:

Component 1.1. Formalization, Entrepreneurship: This aims at digitization and streamlining business registration and licensing procedures and public records
   I. Map and streamline all business registration and licensing procedures (including Legal, Business process and IT Systems procurement and maintenance, training and capacity building)
   II. Digitizing existing records at CAC, OARG

Component 1.2. Access to Finance and Financial Inclusion: This aims at strengthening credit reporting systems and facilitating secured transactions. Activities include:
   I. Upgrade and expand existing credit reporting to include MFIs, utilities and others
   II. Expand the scope of Borrowers and Lenders Act
   III. IT System Upgrade for public institutions
   IV. Communication and Training for the public sector

Component 1.3. Property Rights and Digital Records: Specific activities include:
   I. Digitalization of all existing property deeds and front-end website
   II. Construction permits: Introduce legal reforms and IT systems to support reforms and streamline processes.
Component 2: Supporting the growth of SMEs and entrepreneurship: This component is aimed at supporting the growth and competitiveness of SMEs in non-mining based sectors, particularly in tourism and other service based sectors, to improve to improve productivity by addressing critical firm-level and sector-level constraints. These include (i) limited access to finance, (ii) weak capacity of public and private sector institutions (iii) significant last-mile infrastructure gaps (iv) coordination failures amongst GoSL MDAs and (v) weak entrepreneurship ecosystem. Specific support in this regard includes the following:

Component 2.1: Public Goods Intervention: These are public sector interventions that aim to unlock the potential of the private sector and facilitate increased private sector investment. Specifically, this sub component will finance

• **Upgrade Physical Infrastructure** including up to five tourism related sites and the establishment of an SME Solutions Centre or One Stop Shop.

• **Build Capacity Among Private and NGO Actors:** This includes provision of technical assistance to build capacity technical skills related to tourism, waste management, business to business linkages and community engagement. Targeted beneficiaries include SMEs in tourism, Business Incubation Programs, education institutions, NGOs and Civil Society Organizations.

• **Stimulate Entrepreneurship:** through provision of business development services, skills up grade and training in partnership with local universities and educational institutions

• **Rebrand Tourism:** This activity will be driven by a National Tourism Marketing Strategy, to be developed in the early stages of the project, which will outline key markets, actions and approaches to marketing the destination. Subsequently, this sub-component will finance rebranding and marketing actions to be outlined in the Strategy.

Sub-Component 2.2. SME and Start Up Acceleration: This sub-component will provide integrated support services to capacity of growth-oriented SMEs and start-ups both in the formal and informal sectors. This activity will be delivered through SME incubation which will largely be delivered by existing incubator programs in the eco-system.

Sub-Component 2.3. Early Stage Financing: This subcomponent is targeted at improving access to finance for both growth-oriented SME and Start-ups for them to make investment necessary productivity-enhancing investments. This sub-component also aims at addressing the systemic failures in providing affordable and appropriate financing to SMEs at the start-up and growth stages. It will do so by:

I. Offering a blend of financing instruments of equity, quasi-equity and debt.

II. Support to Strengthening Early Stage Risk Financing Ecosystem

Component 3: Strengthening Public Policy and Project Supervision: This sub-component aims at strengthening Public Sector capacity in the design and implementation of policies that are relevant to economic diversification. It also aims to provide the necessary technical, advisory and financial support for the adequate implementation, management and coordination of the Project; ensure that M&E systems for project and sector-wide analysis systems are upgraded and sustained; and implement a robust citizen engagement and communications program for project and sector inclusiveness. Specific
activities include:

- **Strengthening Public Policy Capacity:** This activity will support key public sector institutions whose functions play a key role in facilitating private sector led growth. The subcomponent will develop a comprehensive approach to building capacities including technical assistance to strengthen selected technical functions, review of critical laws and policies, hold study tours, knowledge exchanges, learning events and on-the-job training for practitioners. Key institutions identified for support include Ministry of Trade and Industry, Ministry of Tourism and Cultural Affairs, National Tourist Board, SME Development Agency, Local Content Agency, the Standards Bureau and the Economic Policy Unit.

- **Monitoring and Evaluation:** building robust M&E tracking systems including improved visitor surveys and statistics and where possible randomized trials to monitor and evaluate the impact of the project on intended beneficiaries.

- **Project Coordination:** This activity will fund the setting up of a Project Coordination Unit to manage the technical components of the project. It will also fund the Project Fiduciary Management Unit to provide fiduciary services to the project.

### 1.1 Potential intervention sites and activities

As mentioned above under sub-component 2.1, the project will improve the physical infrastructure such as the upgrading of roads and construction and rehabilitation of buildings at up to five (5) tourism related sites and also construct SME Solutions Centre or One Stop Shop. The specific intervention sites will be selected as part of the project implementation process which may require the acquisition of land for the construction of the facilities. It is envisaged that there may be restriction of access to natural resources on tourist sites. Sand winning which is already illegal, will be totally avoided.

Through participatory consultations, the project will facilitate the identification, demand-driven prioritization and selection of the tourism related sites to develop based on a) market fit, b) economic rate of return of upgrades, c) ease of access, d) benefits to the local population, and e) feasibility.

Once the tourism sites are selected, the communities, service providers and other relevant stakeholders will be involved in creating a participatory site management plan, which includes agreeing on development rules for the site (respecting setbacks and no-build areas are a pressing problem), training needs and defining the specific works to be undertaken in each site. This collaboration will continue through to the upgrading process to ensure buy-in and ownership over the decisions taken. Training, marketing and capacity building support will be provided to the selected destinations under funds available in Components 1 and 2.

There will be SME solution center in Freetown and also, one other Province yet to be identified. A key partner on the implementation team is the SME Development Agency (SMEDA) which is under the Ministry of Trade and Industry. The project will utilize the Agency’s knowledge of the sector to select the appropriate province and non-mining SMEs to participate in the project. The infrastructural
requirements (rehabilitation or construction of buildings and/or equipment purchases) will then also be confirmed.

1.2 Institutional Arrangement for Project Implementation

The overall responsibility for steering the project will be with the Ministry of Finance with collaborating ministries being Ministry of Tourism and Cultural Affairs and Ministry of Trade and Industry. The implementing agencies will include SMEDA and National Tourist Board (NTB) which will have primary responsibility for specific activities directly related to their areas of functional responsibility, and in line with the project development objective. The implementation functions and the transfer and accountability for project funds will be detailed in the financing agreement.

The Project Coordination Unit (PCU) will be established within the Ministry of Finance and will use the services of the existing PFMU for all fiduciary and procurement responsibilities. The line ministries and agencies comprising the National Tourism Board, Directorate of Science, Technology and Innovation (DSTI) and Small Medium Enterprise Development Agency (SMEDA) will be responsible for the day-to-day implementation of the various components and activities of the project. Each Technical Implementing Ministry and Agency (TIMA) will therefore have a designated focal point for all SL EDP activities. Each TIMA focal point will be supported by the relevant technical leads within the PCU. The proposed implementation arrangement is shown below.
2.0 OBJECTIVES AND PRINCIPLES OF THE RPF

2.1 Purpose/Objectives of the RPF

The purpose of the Resettlement Policy Framework (RPF) is to establish a comprehensive framework to guide and govern the entire EDP as mainly light civil works packages are defined for funding. The RPF gives a framework of the policy, principles, institutional arrangements and procedures that the SL EDP will follow in each light civil works package involving resettlement. The document sets out actions for addressing and mitigating potential adverse social impacts of the Project. Thus the overall objective is to achieve the following:

a. Measures to avoid or minimize or mitigate involuntary resettlement where feasible, exploring all viable alternatives of project designs,
b. Help resettled people improve their former living standards, their ability to generate revenue or at least to cater for them,
c. Provide assistance to affected people regardless of the legality or land tenure.
d. Describe the legal and institutional framework underlying Sierra Leonean approaches for resettlement, compensation and rehabilitation;
e. Describe the consultation procedures and participatory approaches involving PAPs and other key stakeholders; and
f. Provide procedures for addressing grievances and the resolution of disputes.

The RPF clarifies the rules for identifying people who may be affected by the implementation of project activities of the Project and takes into account the requirements of the World Bank Policy OP 4.12, and the national laws and regulations of Sierra Leone that deals with Involuntary Resettlement.

2.2 Scope of the RPF

The Resettlement Policy Framework covers the following:
- Policy, Principles and objectives governing resettlement preparation and implementation,
- A description of the process for preparing and approving resettlement plans,
- Description of anticipated land acquisition, if any, and likely categories of impact,
- Development of eligibility criteria for defining various categories of project affected persons,
- Establishment of a framework for identification, support, and willingness to provide in the Resettlement Action Plan (RAP) for vulnerable groups, including women and youth;
- Legal framework comparing Sierra Leone’s laws and regulations and the World Bank’s policy requirements on social safeguards and measures proposed to bridge any gaps between them,
- Development of a screening process to identify land acquisition and resettlement impacts,
- Definition of the process for carrying out census/sample socio-economic surveys and focus groups consultations in investment operations;
- Description of the methods of valuing affected assets
• Development of an Entitlement Matrix proposing compensation and assistance for various impact categories; Organizational procedures for delivery of entitlements,
• Provision of guidelines on how the project will address impacts associated with broader social issues that may result from involuntary resettlement such as gender disparities;
• Description of the implementation process, linking resettlement implementation with civil works,
• Provision of an extensive Description of Grievance Redresses Mechanisms,
• Description of in detail the process and mechanisms for consultations with, and participation of, displaced persons in planning, implementation, and monitoring Propose institutional arrangements both at central and entity/district levels with description of delegated powers of various officers and responsibilities for various activities of related to land acquisition and resettlement; arrangements for monitoring and evaluation by the implementing agency and, if required, by independent monitors;
• Development of plan for the public disclosure of the document in country and on the World Bank’s website.

While preparing the RPF, reference was made to the World Bank’s Operational Policy on Involuntary Resettlement (OP4.12) for objectives, principles, process, outline of the RAP, etc. expected to be followed while addressing the issues related to land acquisition and resettlement in any World Bank assisted projects.
3.0 METHODOLOGY AND APPROACH

The RPF has been prepared in accordance with the applicable World Bank safeguard policy on involuntary resettlement (OP 4.12) and Sierra Leonean policies and laws relating to resettlement, land acquisition and compensation for loss of property. The preparation of the RPF involved the following activities:

- Literature review;
- Consultations with selected key stakeholders (sector institutions and communities);
- Data collation, analysis and preparation of reports.

3.1 Literature Review

The following relevant documents among others, were reviewed:

- Review of initial RPF and ESMF documents for the Sierra Leone Tourism Development Project (SLTDP)
- Sierra Leonean policies, plans and regulations regarding resettlement, land take and compensation;
- World Bank Safeguard Policy, OP 4.12 on Involuntary Resettlement and how it compares with the Sierra Leonean laws and procedures;
- RPFs prepared for other recent World Bank projects in Sierra Leone and in the West African sub region, and
- Relevant literature from internet sources.

3.2 Stakeholder Consultations

The key stakeholders were engaged between 14 and 18 May 2018, and also 28 and 31 May 2019 to identify major resettlement related issues that may arise from the implementation of the EDP, as well as gain an insight into the legal and institutional framework available to support its implementation.

The key stakeholders consulted are categorized as project implementers, beneficiaries and Non-governmental organizations as described below:

Project Implementers
1. Ministry of Finance
   a. Economic Policy and Research Unit
2. Ministry of Tourism and Cultural Affairs
   a. National Tourist Board
3. Ministry of Lands, Housing and Environment (MLHE)
   a. Housing Department
4. Ministry of Works and Public Assets (MWPA)
   a. Survey Department
5. SME Development Agency (SMEDA)- under Ministry of Trade and Industry
Project Partners/ Beneficiaries/ NGO
6. Tourist communities
7. Owners of facilities at tourist sites
8. Sensi Tech Hub
9. NGOs- Rainbo Initiative

Details of the stakeholder engagement are provided in Section 10 of this report.

3.3 Data Collation, Analysis and Preparation of Report

Relevant data and information gathered which are in line with the requirements under the scope of works formed the content of the RPF. The RPF has the following major sections:
1. Executive summary
2. Introduction
3. Principles and Objectives of the RPF
4. Methodology and Approach
5. Baseline socio-economic data and Census
6. Legal and institutional framework for land acquisition and Involuntary Resettlement
7. Valuation method
8. Implementation arrangements and responsibilities for resettlement
9. Grievance redress mechanism
10. Stakeholder consultations, participation and Public Disclosure
11. Budget and sources of funds for implementation
12. Monitoring and Evaluation
13. Annexes
4.0 BASELINE SOCIO- ECONOMIC DATA

An early indication of the GoSL’s active involvement and interest in tourism development dates back to 1964 with the establishment of the Hotels, Travel Agencies, Airlines and National Tourist Board by an act of parliament. The board was charged with the responsibility of overseeing the development and promotion of tourism in Sierra Leone and operated within the framework of the then Ministry of Trade and Industry (Betts, 2016).

In those early years, the growth and development of the industry both at home and abroad was slow and haphazard. There was practically no national policy evolved on which the sustained and directional growth and development of the industry would be based- Decisions made by those at the top were ad hoc and generally inconsistent. Operators within the industry were left to do what they thought was good for the industry and for themselves. This state of affairs continued for close to a decade.

In 1973, however, government decided to establish a Tourism Ministry that would harness the abundant potential tourism resources of the country in order to ensure sustained socio-economic growth in an organized manner thus the creation of the Ministry of Tourism and Cultural Affairs. The Hotel and Tourist Board became an integral part of the newly created Ministry two years later in 1975.

With the establishment of the Ministry, development in the industry started taking shape as was manifested by government’s management of, and construction of Hotels such as Paramount Hotel, Cape Sierra Hotel, Brookfields Hotel, Bintumani Hotel, Mammy Yoko Hotel, and Lungi Airport Hotel and the Provision of other necessary infrastructure facilities.

The financial benefits that accrued to the country from the industry however remained minimal due to ineffective monitoring policies adopted by government as well as heavy leakage factor and tax evasion by the private operators.

Sierra Leone’s tourism sector remains in a pre-emergent stage, with promising post-war growth in visitor arrivals and investment cut short by the Ebola crisis. The country’s tourism sector growth of the 1980s and early 90s was interrupted by its civil war, prior to which the government’s heavy investment in hotels, its tourism policy and planning frameworks yielded positive results as a beach and island-based discovery destination, mainly attracting the French market.

In 2016, Sierra Leone welcomed 53,713 international tourists, of which 10,358 were leisure travelers; 11,511 Visiting Friends and Relatives (VFR) and 20,866 Meetings, Incentives, Conventions and Events (MICE) visitors. The year 2015 saw half the number of tourists, with the estimated inbound receipts being US$23m, with an average of US$966.5 spent per tourist (WEF TTCI, 2016). Its main source markets are the UK and the US, followed by Nigeria and Ghana.

Despite recent setbacks, Sierra Leone’s tourism sector has substantial potential to be a key economic driver. The country possesses pristine beaches and islands, mountains and rich biodiversity, interesting wildlife, friendliness and rich cultural capital among people and its special place in the world history of anti-slavery movement as ‘the land of the free.’ All the major preconditions to restarting tourism, such
as security, safety, local price competitiveness, political stability, documented prioritization and sectoral institutions are present in Sierra Leone.

The GoSL has officially prioritized tourism under Pillar 1 of its Agenda for Prosperity. The new National Tourism Policy states the goal of tourism in Sierra Leone as to “generate foreign exchange, encourage even development, promote tourism-based rural enterprises, generate employment, accelerate rural-urban integration and foster socio-cultural unity among the various regions of the country through the promotion of domestic and international tourism.” (GoSL, 2017). Its National Ecotourism policy states the goal of receiving 20,000 international and 30,000 domestic ecotourism visits to sites by 2025 (GoSL, 2017).

Growth effects aside, Sierra Leone’s tourism industry may serve as an income equalizer (World Bank, 2009). Tourism can have a direct impact on the poor through direct employment and indirect linkages with the tourism supply chain. Sierra Leone will need to reduce its dependence on minerals and develop one or more labor-intensive sectors including agriculture, tourism and light manufacturing to be able to rebuild its social fabric and a sustainably equitable economy after recovering from the conflict as well as Ebola.

According to the World Travel and Tourism Council (2017):

- The direct contribution of Travel & Tourism to GDP in Sierra Leone was US$0.1bn, which was 1.4% of total GDP in 2016. This was forecast to rise by 7.1% in 2017, and to rise by 5.0% pa, from 2017-2027.
- The total contribution of Travel & Tourism to GDP was US$0.1bn or 3.6% of GDP in 2016, and was forecast to rise by 6.5% in 2017, and to rise by 5.8% pa to US$0.3bn, that is 3.7% of GDP in 2027.
- In 2016 Travel & Tourism directly supported 15,500 jobs (1.2% of total employment). This was expected to rise by 8.2% in 2017 and rise by 2.0% pa to 21,000 jobs (1.2% of total employment) in 2027.
- In 2016, the total contribution of Travel & Tourism to employment, including jobs indirectly supported by the industry was 3.2% of total employment (41,000 jobs). This is expected to rise by 6.9% in 2017 to 44,000 jobs and rise by 2.7% pa to 58,000 jobs in 2027 (3.4% of total).
- Visitor exports generated US$26.2 million, that is 2.2% of total exports in 2016. This is forecast to grow by 10.6% in 2017, and grow by 3.4% pa, from 2017-2027, to US$40.4 million in 2027, 1.7% of total.
- Travel & Tourism investment in 2016 was 4.4% of total investment. It should rise by 2.5% in 2017, and rise by 7.2% pa over the next ten years in 2027, 4.9% of total.
5.0 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK
The principles and procedures for land acquisition and resettlement in this project are drawn mainly from relevant land acquisition laws, regulations and policy framework of Sierra Leone and the World Bank safeguards policies.

5.1 Relevant National Regulatory Framework on Land and Compensation

The relevant national environmental and other statutory laws and legislation particularly relevant to the project include the following:

- The Constitution of Sierra Leone (1991) and the Protection of Individual Property;
- National Tourism Policy
- National Lands Policy (2015);
- National Environmental Policy (1994); and

5.1.1 The Constitution of Sierra Leone (1991) and the Protection of Individual Property

The Constitution includes some provisions to protect the right of individuals to private property, but Section 21 of the Constitution also sets principles under which citizens may be deprived of their property in the public interest. Section 21 (1)c indicates that: “Provision is made by law applicable to that taking of possession or acquisition

i. for the prompt payment of adequate compensation; and

ii. securing to any person having an interest in or right over the property, a right of access to the court or other impartial and independent authority for the determination of his interest or right, the legality of the taking of possession or acquisition of the property, interest or right, and the amount of any compensation to which he is entitled and for the purpose of obtaining prompt payment of that compensation”

Consequently, the Constitution upholds the fundamental rights of citizens to own property and receive compensation from the State when that property is compulsorily acquired by the State. Furthermore, it also makes provision for the prompt payment of adequate compensation and access to the court or other impartial and independent authority for the determination of the land owner’s interest or right, and the amount of any compensation to which he is entitled and for the purpose of obtaining prompt payment of that compensation.

5.1.2 National Tourism Policy

The recently validated National Tourism Policy (2017), affirms the goal of tourism in Sierra Leone as to generate foreign exchange, encourage even development, promote tourism-based rural enterprises, generate employment, accelerate rural urban integration and foster socio-cultural unity among the various regions of the country, through the promotion of domestic and international tourism.
One of the principal objectives of establishing the tourism policy is to guarantee and safeguard the effective standardization of processes and practices within the industry. This standardization fosters uniformity and consensus regarding practices which can result in increased sustainability and an overall improvement in the quality of the tourism product. Furthermore, an appropriate use of environmental and human resources should take place as a result of the implementation of the tourism policy.

The sustainable tourism policy will facilitate government’s heightened involvement in the activities of the tourism sector. If policies are implemented, leading to formulation of effective legislation, the result should be an increased effectiveness and efficiency of tourism activities.

5.1.3 National Lands Policy (2015)

Land allocation decisions are considered ridden with conflicting interests in the land by policy makers, chiefs and other functionaries. In particular, land held by the State is considered not to be managed in a transparent, accountable, and efficient manner. Numerous ad hoc and short term measures are being undertaken by the government to improve the effectiveness of the existing land administration system, particularly at central government level in the Ministry of Lands, Country Planning and the Environment. In the Western Area and the Provinces various pilot efforts are being discussed in order to improve the management of land and resolve the diverse demands for land, including the emerging land disputes. Land use and urban planning systems are also being interrogated.

In order to deal with the diverse issues raised by the present complex institutional framework, the Policy has proposed a single, autonomous, decentralized land administration and land management institution to be known as the National Land Commission (NLC) founded in the Constitution and shall be detailed in a statute enacted for that purpose. The Commission shall function at district, chiefdom and village levels with membership drawn primarily from tenure right holders and with a great degree of autonomy. The Ministry of Lands, Country Planning and Environment (MLCPE) will supervise the implementation of the Lands Policy.

The aspiration of the revised land policy of 2015 is to move towards a clearer, more effective and just land tenure system that shall provide for social and public demands, stimulate responsible investment and form a basis for the nation’s continued development. The Policy affirms that a secure land tenure system is a critical element of consolidating the peace and recovery processes in Sierra Leone and it is fundamental to the nation’s development.

Some of the main problems related to land tenure currently prevalent in Sierra Leone and which are addressed in the Policy are:

- Inequitable access to land;
- Shortage of accessible land in the Western Area;
- “Squatting” on State and private lands in the Western Area due to rapid urbanisation;
- Insecure tenure forms and rights due to the absence of a system of registration of titles;
- Lack of proper cadastral mapping and land information;
• unclear and diverging tenure forms under customary law;
• overlapping jurisdictions for statutory and customary law;
• Weak land administration and management, i.e. inadequate capacity within the responsible Ministry to carry out its scope of responsibility and meet set objectives;
• Lack of a proper cadastral and land use information database for State, private, and customary lands; and
• Inadequate concession practices and protective mechanisms inserted to prevent “land-grabbing” in the commercial land use sector.

5.1.4 National Environmental Policy (1994) and Cultural Heritage Issues

The National Environmental Policy (1994) provides for the collection of relevant data on biological diversity and cultural heritage. It seeks to promote socio-economic and cultural development through the preservation of biological diversity for the sustainable utilization of natural resources. There are references to the preservation and/or respectful removal (taking into consideration cultural sensitivities) of “society bushes” for large-scale agribusiness and other purposes in various regulations.

5.1.5 The Local Government Act, 2004

The Act establishes the Local Council as the highest political authority in the locality who shall have legislative and executive powers to be exercised in accordance with this Act. This Act in its First Schedule under section 2 establishes the localities namely: Districts, Towns, and Cities. The part II of this schedule also establishes the number of Paramount Chiefs in each local council. The Third Schedule establishes the functions to be devolved to the local councils. The Fourth and Fifth Schedules establish departments under each local council, and Valuation list and Rate Books respectively.

Ministry of Lands, Housing and Environment (MLHE)

This ministry was recently renamed from the erstwhile Ministry of Lands, Country Planning and Environment (MLCPE). Land governance in Sierra Leone is the responsibility of several state and private agencies, departments, offices and officials. The Ministry of Lands, Housing and Environment (MLHE) is the main institution responsible for taking leadership of all land matters in the country. It is responsible for land registration, and preparation of land use plans.

Office of the Administrator and Registrar General (OARG)

Office of Administrator and Registrar General (OARG) only functions in the Western Area, situated in Freetown, the capital city. It has as its supervisory Ministry, the Office of the Attorney General and Ministry of Justice; and generates revenue for the government. The OARG is responsible for the registration and administration of every instrument required to be registered by law including land transactions, industrial property, business registration, marriages and administration of estates of the deceased, apart from that of “births and deaths”.

The main link between the MLCPE and OARG is that survey plans are prepared by the MLCPE and sent to
OARG for registration. There has been an attempt to automate the link between OARG and MLCPE in the transfer of land documents through the implementation of the Land Registration Project at MLCPE and the Electronic Documentation of Land Records Project at OARG, both funded by the Investment Climate Facility for Africa.

The OARG is responsible for registering land instruments (survey plans and conveyances), as established by the General Registration Act of 1960 (Cap 256).

5.2 Land Ownership and Tenure System

Land tenure in Sierra Leone is characterized by a dual ownership structure due to historical developments. The Western Area including the Freetown Peninsula is governed by an English system of land ownership which includes fee conveyances, mortgages and leases. Unoccupied and uncultivated land remain Crown (State) land. Thus, land in these areas is either owned by individual families or is Crown land. Communally owned land does not exist in the Western Area.

Land in the rest of the country (i.e. the majority of the agricultural land) is held in communal ownership under customary tenure and is controlled by traditional rulers who administer it on behalf of their communities in accordance with customary principles and usage. Though there are minor differences among the various ethnic communities, the general trend is that land is considered a divine heritage not to be bought and sold.

The responsibility to ensure the preservation of the land and subsequent enjoyment by future generations therefore rests on the community as a whole. The absolute interest in land vests in families. In other words, it is the land-owning family, which deals in its land. The Paramount Chief is regarded as the custodian of the land on behalf of the entire Chiefdom but decisions regarding the land are the preserve of heads of the various land owning families.

5.3 World Bank Safeguard Policy on Involuntary Resettlement

5.3.1 Procedures for Involuntary Resettlement according to World Bank OP 4.12

World Bank’s Operational Policy (OP) 4.12 (World Bank, 2004)) is to be complied with where involuntary resettlement, impacts on livelihoods, acquisition of land or restrictions to access to natural resources, may take place as a result of the project. The fundamental objective of resettlement planning, as stipulated in OP 4.12, is to avoid resettlement wherever feasible, or, where resettlement is unavoidable, to minimize its extent and to explore all viable alternatives.

- Where land acquisition and involuntary resettlement are unavoidable, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable persons physically displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing
resettlement programs. Furthermore, Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

The OP 4.12 further requires particular attention to be given to the needs of vulnerable groups especially those below the poverty line, including:

i. Landless individuals and households;
ii. Elderly persons
iii. Women and children;
iv. Indigenous groups and ethnic minorities; and
v. Other disadvantaged persons.

5.3.2 **Comparison of Sierra Leonean Regulations and World Bank Policies**

There are significant gaps between Sierra Leonean regulations and World Bank policies. These are summarized in the table below: Where there is discrepancy between national policy and the World Bank policies, under this project, gap filling measures have been identified and the World Bank policies will apply in accordance with this RPF.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Sierra Leonean Legislation Requirement</th>
<th>WB policy requirement</th>
<th>Proposed Gaps Filling Procedures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timing of compensation payment</td>
<td>Prompt</td>
<td>Prior to displacement</td>
<td>Compensation payments are to be done prior to displacement.</td>
</tr>
<tr>
<td>Calculation of compensation</td>
<td>Fair and adequate.</td>
<td>Full replacement cost</td>
<td>The Full Replacement Cost Approach will be adopted for the calculation of compensation. No depreciation will be considered.</td>
</tr>
<tr>
<td>Squatters</td>
<td>No provision for PAPs with no claim whatsoever to land. Are deemed not to be eligible and therefore not entitled to any compensation</td>
<td>Are to be provided resettlement assistance and compensation for lost or damaged structures, and trees or crops they planted (but no compensation for land itself)</td>
<td>Squatters are to be provided resettlement assistance and compensations for crops, trees and structures (but no compensation for land)</td>
</tr>
<tr>
<td>Land Tenants</td>
<td>Entitled to compensation based upon the amount of rights they hold upon land under relevant laws.</td>
<td>Are entitled to some form of compensation whatever the legal recognition of their occupancy</td>
<td>Land tenants attract compensation irrespective of the legal recognition of their occupancy</td>
</tr>
<tr>
<td>Land Users</td>
<td>In some cases land users have some form of secured tenure extended to them under new laws. In other</td>
<td>Entitled to compensation for crops, may be entitled to replacement land and income must be restored</td>
<td>-Provisions are almost the same</td>
</tr>
<tr>
<td>Topic</td>
<td>Sierra Leonean Legislation Requirement</td>
<td>WB policy requirement</td>
<td>Proposed Gaps Filling</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Users of natural resources subject to be put under control of conservancy members for sustained use and development</td>
<td>cases land users are not entitled to compensation for land but are entitled to compensation for crops and any other economic assets.</td>
<td>to pre-project levels at least.</td>
<td>Compensation to be provided for lost income. Alternative livelihood arrangements to be considered for loss of income from restriction of access to resources</td>
</tr>
<tr>
<td>Owners of “Non permanent” buildings (Moveable assets)</td>
<td>No compensation when law is followed</td>
<td>Entitled to compensation for lost income from loss of access to or use of resources: lost income must be computed, and restored to pre-project levels at least.</td>
<td></td>
</tr>
<tr>
<td>Owners of Permanent Buildings</td>
<td>Cash compensation based on market value or entitled to new housing or authorized land under Government (State or local) housing programs</td>
<td>Entitled to in kind compensation or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement</td>
<td>PAPs entitled to in kind compensation or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement</td>
</tr>
<tr>
<td>Resettlement</td>
<td>In situations where inhabitants have to be physically displaced, the state is to resettle all on “suitable land with due regards for their economic well-being and social and cultural values”.</td>
<td>Affected people who are physically displaced are to be provided with residential housing, or housing sites, or, as required, agricultural sites at least equivalent to the old site. Preference to be given to land-based resettlement for displaced persons whose livelihoods are land-based.</td>
<td>Physically displaced PAPs are to be provided with housing sites at least equivalent to the old site. Preference to be given to land-based resettlement for displaced persons whose livelihoods are land-based (i.e. farmers, etc.). Alternatively, physically displaced PAPs can also be given equivalent cash compensation to be able to acquire similar land and put up a housing unit equivalent to the affected structure</td>
</tr>
<tr>
<td>Resettlement assistance including livelihood restoration</td>
<td>No specific provision with respect to additional assistance and monitoring.</td>
<td>Affected people are to be offered support after displacement, for a transition period</td>
<td>Affected people are to be offered resettlement support to cover a transition period including livelihood restoration programmes</td>
</tr>
<tr>
<td>Topic</td>
<td>Sierra Leonean Legislation Requirement</td>
<td>WB policy requirement</td>
<td>Proposed Gaps Filling Procedures</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>----------------------------------------</td>
<td>----------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Vulnerable groups</td>
<td>No specific provision</td>
<td>Particular attention to be paid to vulnerable groups, especially those below the poverty line, the landless, the elderly, women, children and the disabled,</td>
<td>Particular attention to be paid to vulnerable groups, especially those below the poverty line, the landless, the elderly, women especially widows and single parent, children and the disabled.</td>
</tr>
<tr>
<td>Information and consultation</td>
<td>The owner/occupier of the land must be formally notified at least a week in advance of the intent to enter, and be given at least 24 hours’ notice before actual entry</td>
<td>Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement.</td>
<td>Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement.</td>
</tr>
<tr>
<td>Grievance</td>
<td>Formal and informal mechanisms and formal access to court of law</td>
<td>Functional, effective, transparent and accessible grievance mechanisms to be established</td>
<td>Functional, effective, transparent and accessible grievance mechanisms to be established</td>
</tr>
</tbody>
</table>
6.0 ELIGIBILITY CRITERIA AND ENTITLEMENT MATRIX

Project affected persons are described as persons affected by land acquisition, land occupation, relocation, or loss of income associated with the acquisition of land and/or other assets. Based on an understanding of the social structure of the rural and urban communities and the nature of the EDP activities, it is possible to suggest that the most likely project affected persons (PAPs) will comprise individuals, families, traditional authorities, communities as a whole.

6.1 Potential adverse impacts on Assets and Livelihoods

There are no significant adverse impacts on assets and livelihoods anticipated from the implementation of the EDP. Some activities which may however potentially create resettlement-related concerns include:

- Provision of infrastructure (e.g., rehabilitation or construction of buildings) associated with tourist activities and the SME Solution Center that may lead to loss of land, either government or private lands;
- The provision of facilities at tourist sites or the Solution Center may cause the removal of structures or crops, if they occur on the lands to be used for any new project;
- New construction projects on acquired land may impact on livelihoods of project affected persons (PAPs) including their assets used as businesses, including farming;
- The livelihood of current workers at tourist centers earmarked for rehabilitation may be impacted; and
- Structures on encroached sections of beaches and other such tourist sites may be affected, if such encroached sections are required for or will be utilized by any EDP activity or subproject.

Provisions are made under this RPF to avoid, minimize, mitigate or compensate for residual impacts: specifically any EDP subproject or activity entailing impacts on inhabited dwellings shall be redesigned to address such impacts feasible and practical to do so.

However, as EDP activities and locations are not fully known in sufficient detail at the time of preparing this RPF, provisions are made in the RPF to accommodate all potential situations, including cases that may entail actual displacement/resettlement, and livelihood restoration assistance in concordance with the WB policy on Involuntary Resettlement.

6.2 Generic Project Impacts on Assets and Livelihoods

6.2.1 Categorization of impacts by type of sub-projects

The project activities will involve provision of infrastructural services (civil works support ranging from rehabilitation of yet-to-be identified existing sites, to new and yet to be identified sites). The probable project infrastructure to be provided may include the following:

- Rehabilitation of old buildings
- Construction and upgrading of facilities at tourist sites (hotels, guest houses and conference facilities/ resource centers)
- Construction and upgrading of access roads
- Provision of electricity and water supplies/ facilities
- Construction of jetty (eg. at Kent if selected)
- Provision of solid waste management facilities
- Provision of sanitation facilities (toilets, urinals etc)
- Construction of shops/ stalls
- Construction of information/ security posts/ offices/ car parks
- Etc

Table 2 shows in generic terms what impacts on assets (land, crops, structures, cultural heritage resource) and livelihoods can be expected from identified project activities under the EDP.

**Categorization of project land needs**

Land required for the Project may fall under the following three categories:

a. Land permanently required (acquisition required under the Project) for construction and operation of new facilities (e.g. Offices, sanitation, parking lots, restaurants, hotels/ guest houses, water supply, electricity supply)

b. Land temporarily required (temporary occupation required under the Project) for the duration of project activities (e.g. RoW for utility lines, if required); and

c. Land permanently required (no acquisition required under the Project) for the duration of project activities and support (e.g. beaches, existing acquired government lands to be used for the project and private lands to benefit from up-scaling activities under the Project).

Table 3 presents the eligibility criteria and entitlement matrix for the general categories of impacts that could occur under the EDP.
### Table 2: Generic potential project activities and likely impacts on Assets and Livelihoods

<table>
<thead>
<tr>
<th>Detailed activities to be financed</th>
<th>Detailed activities to be financed</th>
<th>Potential Impact on Assets, Livelihoods</th>
<th>Potential Impact on Assets, Livelihoods</th>
<th>Potential Impact on Assets, Livelihoods</th>
<th>Potential Impact on Assets, Livelihoods</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rehabilitation of old buildings</td>
<td>No land to be acquired</td>
<td>Crops may be affected (due to encroachment)</td>
<td>Structures many be affected (due to encroachment)</td>
<td>Farms or business activity (kiosks etc) on project site may be affected</td>
<td>No impact on cultural heritage resource (e.g. cemetery, shrine or grove)</td>
</tr>
<tr>
<td>Construction and upgrading of buildings (hotels, guest houses and conference facilities/resource centers)</td>
<td>Land may be required for new facilities</td>
<td>Crops on acquired land may be affected</td>
<td>Any structures on land may be demolished or moved, where possible</td>
<td>Farms or business activity as source of livelihood on the proposed project site may be affected</td>
<td>Any cultural heritage resource (e.g. cemetery, shrine or grove) on or near land may be affected</td>
</tr>
<tr>
<td>Construction and Upgrading of access roads</td>
<td>Land may be required for new road</td>
<td>Crops on land may be affected</td>
<td>Any structures on the proposed road may be demolished or moved, where possible</td>
<td>Farms or business activity (kiosks etc) on project road may be affected</td>
<td>Any cultural heritage resource (e.g. cemetery, shrine or grove) on or near road may be affected</td>
</tr>
<tr>
<td>Provision of solid waste management facilities</td>
<td>Land may be required for siting of facilities</td>
<td>Crops on acquired land may be affected</td>
<td>Any structures at the proposed site may be demolished or moved, where possible</td>
<td>Farms or business activity as source of livelihood on the proposed site may be affected</td>
<td>Any cultural heritage resource (e.g. cemetery, shrine or grove) on or near land may be affected</td>
</tr>
<tr>
<td>Provision of sanitation facilities (toilets, urinals, waste treatment etc)</td>
<td>Land may be required for siting of facilities</td>
<td>Crops on acquired land may be affected</td>
<td>Any structures at the proposed site may be demolished or moved, where possible</td>
<td>Farms or business activity as source of livelihood on the proposed site may be affected</td>
<td>Any cultural heritage resource (e.g. cemetery, shrine or grove) on or near land may be affected</td>
</tr>
<tr>
<td>Construction of information/security posts/offices</td>
<td>Land may be required for siting of facilities</td>
<td>Crops on acquired land may be affected</td>
<td>Any structures at the proposed site may be demolished or moved, where possible</td>
<td>Farms or business activity as source of livelihood on the proposed site may be affected</td>
<td>Any cultural heritage resource (e.g. cemetery, shrine or grove) on or near land may be affected</td>
</tr>
<tr>
<td>Detailed activities to be financed</td>
<td>Potential Impact on Assets, Livelihoods</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>--------------------------------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Land</td>
<td>Crops</td>
<td>Structures</td>
<td>Livelihoods</td>
<td>Cultural resources</td>
</tr>
<tr>
<td>Construction of shops/ stalls</td>
<td>Land may be required for siting of facilities</td>
<td>Crops on acquired land may be affected</td>
<td>Any structures at the proposed site may be demolished or moved, where possible</td>
<td>Farms or business activity as source of livelihood on the proposed site may be affected</td>
<td>Any cultural heritage resource (e.g. cemetery, shrine or grove) on or near land may be affected</td>
</tr>
<tr>
<td>Provision of electricity preferably Solar sources</td>
<td>Land may be required for Solar installation and right of way (RoW) for lines.</td>
<td>Crops on affected/ acquired land may be affected</td>
<td>Any structures on land may be demolished or removed</td>
<td>Farms as source of livelihood may be lost</td>
<td>Any cultural heritage resource (e.g. cemetery, shrine or grove) on or near land may be affected</td>
</tr>
<tr>
<td>Provision of water supply systems, including solar water – powered pumping machine</td>
<td>Land may be required for water supply facilities installation and right of way for pipelines</td>
<td>Crops on acquired land may be affected</td>
<td>Any structures on land may be demolished or moved, where possible</td>
<td>Farms or business activity as source of livelihood on the proposed project site may be affected</td>
<td>Any cultural heritage resource (e.g. cemetery, shrine or grove) on or near land may be affected</td>
</tr>
<tr>
<td>Construction of jetty (eg. at Kent)</td>
<td>Land may be required for right of way to water front</td>
<td>Crops on land may be affected</td>
<td>Any structures on the route to landing may be demolished or moved, where possible</td>
<td>Farms or business activity as source of livelihood on the proposed project route may be affected</td>
<td>Any cultural heritage resource (e.g. cemetery, shrine or grove) on or near land may be affected</td>
</tr>
<tr>
<td>Grievance Redress Mechanism - Reviewed and Rolled-Out</td>
<td>Successful implementation of the mechanism will have significant impact on the success of the project</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table 3: Eligibility Criteria and Entitlements

<table>
<thead>
<tr>
<th>Affected Assets</th>
<th>Type of impact</th>
<th>Entitled units</th>
<th>Eligibility criteria</th>
<th>Entitlement</th>
</tr>
</thead>
</table>
| Land                          | Permanent acquisition of land,         | Landowner (individual, family, community/stool)                              | Owns the affected plot of land under Sierra Leonean laws including customary                               | 1. in-kind compensation (land to land) for land-based displacement at a suitable location comparable to the previous land or better  
                                   |                                       |                                                                                |                                                                 | 2. Cash compensation for land determined by prevailing market rates where there is satisfactory demonstration of lack of adequate land or strong preference by the PAP.  
                                   |                                       |                                                                                |                                                                 | 3. Land replacement for community Lands or if unavailable, compensation be paid to the community with their full consultation and participation.  
                                   |                                       |                                                                                |                                                                 | 4. cash compensation covering all administrative, land registration and transfer fees                                                                                                                      |
| Land                          | Temporary occupation of land           | Landowner (individual, family, community/stool)                              | Owns the affected plot of land under Sierra Leonean laws including customary                               | 1. Compensation (in cash or kind) for the period of occupation as agreed among the parties via negotiation.  
                                   |                                       |                                                                                |                                                                 |  
| Crops (food/cash crops and economic trees inclusive) | Destruction of/ damage to standing crops | Owner or Farmer                                                              | Have grown the affected crop (regardless of related plot ownership)                                           | 1. Cash compensation for standing crops counted at valuation date and based upon updated Survey Department rates  
                                   |                                       |                                                                                |                                                                 | 2. Cost of replanting to the same maturity level  
                                   |                                       |                                                                                |                                                                 | 3. Disturbance allowance of 10% of (1) or at a rate determined by MLHE.  
<pre><code>                               |                                       |                                                                                |                                                                 | 4. to the extent feasible, allow for farmers to harvest crops before start of project interventions                                                                                                        |
</code></pre>
<table>
<thead>
<tr>
<th>Affected Assets</th>
<th>Type of impact</th>
<th>Entitled units</th>
<th>Eligibility criteria</th>
<th>Entitlement</th>
</tr>
</thead>
</table>
| Structures     | Destruction of immovable structures | Owner | Owns affected structure | 1. Compensation at full replacement cost of structure  
2. Cost of moving (e.g. persons/ goods in the structure under or belonging to owner)  
3. Disturbance allowance of 10% of (1) or at a rate determined by the MLHE |
|                |                | Occupant | Live in or use the affected structure on rental basis (Occupant different from owner) | 1. Cost of renting similar structure (e.g. for 6 months’ duration)  
2. Cost of moving out to new place  
3. Disturbance allowance of 10% of (1) or at a rate determined by the MLHE |
|                |                | Squatter | Live in or use the affected structure as at time of census | 1. Compensation for full replacement cost |
| Relocation of movable structures | Owner | Owns the affected structure | 1. Cost of moving affected structure to new site  
2. Disturbance allowance of 10% of (1) or at a rate determined by the MLHE |
|                | Occupant | Use or occupies the affected structure | 1. Cost of moving occupants to new site  
2. Disturbance allowance of 10% of (1) or at a rate determined by the MLHE [NB: if owner is same as occupant, he/she will not be entitled to this disturbance allowance]. |
<p>| Livelihoods    | Agriculture - destruction of economic or cash crops | Farmer | Use affected land for farming as livelihood sources (emphasis on perennial crops. Annual crops can be harvested prior to land entry or destruction) | 1. Cash compensation for any temporary loss of income or livelihood incurred as a result of the project during the transition period (period required to re-establish farm elsewhere). |
|                | Businesses | Business person (may be distinct from owner of structure where business takes place) | Operate a business on Project affected land, regardless of the land ownership situation (includes squatters) | 1. Cash compensation of temporary loss of income or livelihood incurred because of the Project during the period required to re-establish the business to pre-Project conditions |
|                | Use of communal resources such as User of such resources (can be | Use communal resources as an element of livelihood | 1. Assistance in identifying and accessing similar resources elsewhere |</p>
<table>
<thead>
<tr>
<th>Affected Assets</th>
<th>Type of impact</th>
<th>Entitled units</th>
<th>Eligibility criteria</th>
<th>Entitlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Livestock grazing grounds, (or involuntary restrictions to community assets)</td>
<td>individuals or communities</td>
<td>2. Cash compensation of temporary loss of income incurred because of the Project during the period required to access similar resources elsewhere/period required to provide alternative livelihood assistance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cultural heritage resource (e.g. sacred site). Relocation of or removal of cultural heritage resource located on project site</td>
<td>Owner (individual or community)</td>
<td>Use or pay homage to cultural heritage resource/ sacred site</td>
<td>Negotiate with owner or community with regard to rites to be performed to ensure successful relocation or removal of cultural resource/ sacred site in accordance with Chance Find procedures prescribed under the ESMF.</td>
<td></td>
</tr>
</tbody>
</table>
6.3 Principles, Objectives and the Resettlement Process

Principles
The principles are the basic fundamental requirements that underpin the preparation and implementation of the resettlement instrument. These principles are intended to minimize negative impacts. The principles include:

- Regulatory framework;
- Minimization of physical and economic displacement;
- Cut-off date;
- Income and livelihood restoration;
- Compensation payment prior to physical and economic displacement and at full replacement value;
- Hold meaningful consultations with all stakeholders; and
- Grievance mechanisms.

Regulatory Framework
Any impact of the EDP on land and/or people (land acquisition, resettlement, and livelihood restoration of affected people) will be addressed in compliance with the Constitution of Sierra Leone, with other national regulations, and with the World Bank safeguard policy on involuntary resettlement (OP 4.12). Where there are gaps or inconsistencies between national laws and the World Bank policy, the World Bank policy OP 4.12 will apply in compliance with this RPF.

Avoidance and Minimization of Physical and Economic Displacement
In line with the World Bank safeguard policy OP 4.12, the EDP will avoid or minimize displacement through the following design procedures:

- To the extent possible, existing facilities of the Tourist Development Board and their collaborating Agencies on government lands will be selected for rehabilitation under the EDP;
- Wherever inhabited dwellings may potentially be affected by a component of an EDP activity or sub-project, an alternative site or land will be sought or the activity/sub-project shall be redesigned to avoid any impact on such dwellings and to avoid displacement/relocation accordingly;
- Wherever the impact on the land holding of one particular community or household is such that the mitigation measure to be applied may not be sustainable in the long term, the EDP activity shall be redesigned or another community/house reconsidered to avoid any such impact;
- Minimization of land impact will be factored into site and technology selection and design criteria;
- Costs associated with displacement and resettlement will be internalized into EDP activity costs to allow for fair comparison of processes and sites;
- To the extent possible, project facilities will be located on lands with no structures;
- Land owners and community members who have access to lands without encumbrances will be considered for the project; and
- Infrastructures required by the project will be sited on government lands which has not been encroached or private lands which the owner is willing to use to participate under the programme without compulsion.
Cut-off date

The objective of the cut-off date is to establish a deadline for which project affected persons qualify for entitlement to compensation. Persons entering or undertaking any development in the Project Area after the Cut-Off Date are not eligible for compensation and/or resettlement assistance.

In accordance with OP 4.12 and for each sub-project activities under the EDP, a cut-off date will be determined, taking into account the likely implementation schedule of the sub-project to avoid potential rent-seeking or influx of people who may want to take advantage of the process. To ensure consistency between Sierra Leonean legal requirements and WB policies, the cut-off date should be the date of inventory of assets/properties.

In line with OP 4.12, the following three categories of affected people will be eligible to Project resettlement assistance:

a) those who have formal legal rights to land (including customary and traditional rights [recognize ownership and use systems inherent in customary land tenure systems] recognized under the laws of the country);

b) those who do not have formal legal rights to land at the time of the cut-off-date but have a claim to such land or assets-provided that such claims are recognized under the laws of Sierra Leone or become recognized through a process identified in the resettlement plan; and

c) those who have no recognizable legal right or claim to the land they are occupying.

Persons covered under (a) and (b) above are provided compensation for loss of land and assets and other assistance as needed. Persons covered under (c) above are provided resettlement assistance in lieu of compensation for the land they occupy, and other assistance, as necessary, if they occupy the project area prior to the cut-off date. In practice this means that, people usually considered in Sierra Leone as “squatters” will be entitled to Project assistance as long as they are in occupation on the affected property before the cut-off date. However, persons who encroach on the area after the cut-off date are not entitled to compensation or any other form of resettlement assistance. All persons in the three categories above are provided compensation for loss of assets other than land (i.e. structures and crops).

Income and Livelihood Restoration

One paramount principle of World Bank safeguards is that where people are affected by land take, the aim of resettlement must be that they should be “no worse-off if not better off” after the resettlement has taken place. Where impact on land use is such that people may be affected in the sustainability of their livelihoods, preference will be given to land-for-land solutions rather than cash compensation, in consistency with the Constitution of Sierra Leone and with OP 4.12.

This applies to people who are not necessarily physically displaced but who are affected by a land loss that affects their sustainability. Affected people will be monitored in the rehabilitation of their livelihood during, and after the transition period. Livelihood restoration measures will be assessed in relevant Resettlement Action Plans (RAPs) and Abbreviated Resettlement Action Plans (ARAPs) depending upon the specific situation of the considered location.

Compensation payment

Compensation principles will be as follows:
• Compensation shall be paid prior to physical and economic displacement / land entry; and
• Compensation for structures will be at full replacement value and land at the current market value or above.

By contrast with the depreciated or net value of a structure, the “replacement value” includes the full cost of materials and labour required to reconstruct a building of similar surface and standing. In other words, the affected person must be able to have their structure rebuilt in a different location using the compensation paid for the old building.

**Consultation- Grievance Mechanism**

The application of the WB policy requirement in respect of consultation will require:
• meaningful information and consultation to take place before the process leading to displacement is launched in each particular location concerned by a EDP activity;
• a specific grievance registration and processing mechanism to be put in place; and
• Grievance redress Committees set up and operationalized in project impact areas.

### 6.4 Objectives of the Resettlement/Compensation Programme

The main objectives of the resettlement related/compensation programme are as follows:
• To avoid or minimize displacement and cash compensation as much as possible;
• To ensure that project affected people are consulted and their concerns included in the resettlement/compensation programme for implementation;
• To ensure that project affected people are adequately compensated for deprivation of use of land, loss of crops and structures (either farming or business/ residential structure or communal property);
• To compensate the affected units and enterprises for their loss at full replacement cost;
• To identify vulnerable groups including the elderly, physically challenged, women heads etc. among the project affected people and prescribe any special assistance they may require in terms of extra attention during the implementation of the programme; and
• To meet both national regulatory and WB requirements.

### 6.5 Resettlement Processes

**Categorization of Project Activities with respect to Land needs**

Currently, there is no clarity on how lands for the construction of some of the facilities especially the one stop shop centers, will be acquired. Two different situations may arise in respect of land needs and resettlement requirements:

a. The project component has no need for land other than what has already been acquired as State land. In such cases, documentation of resolution of previous disputes will be required before these are approved.
b. The implementation of the project component (e.g. construction of tourist facilities) may require land acquisition (e.g. involuntary land acquisition from individuals with freehold title and involuntary land acquisition from communities or encroached public lands).

In situation a) above, the fact that there is no land acquisition involved means that procedures required by the Sierra Leonean law do not need to be triggered. Proposed processes will therefore be consistent with WB requirements only. Situation b) is more complex because it implies that both Sierra Leonean procedures and WB requirements are to be followed.

The situation b) is the more likely scenario as the project will require that land is acquired.

6.5.1 Overview of the Resettlement Preparation Process

The resettlement preparation process will begin with screening of EDP subprojects/activities to determine if there is need for the preparation of any resettlement instrument (ARAP or RAP). A sample screening checklist for identifying cases of involuntary resettlement is provided in Annex 1. The number of affected people will determine whether the process is to include the preparation of a full RAP or of an ARAP. The PCU will use the SMEDA and NTB officers to determine the number of affected persons/assets under any EDP activity that is likely to generate resettlement related or compensation issue.

Resettlement Action Plan (RAP)
The RAP will be prepared where more than 200 individuals are physically or economically displaced. The tasks/ToR and content for the preparation of the RAP is given in Annex 2. All RAPs will need World Bank approval prior to commencing resettlement activities. Resettlement activities must be completed before commencing civil works.

Abbreviated Resettlement Action Plan (ARAP)
The ARAP will be prepared where less than 200 individuals are physically or economically displaced or where the productive assets of affected persons is less than 10% of their assets. The tasks/ToR and content for the preparation of the ARAP is given in Annex 2. All ARAPs will need World Bank approval prior to commencing resettlement activities. Resettlement activities must be completed before commencing EDP activities on the ground.

Census of Affected Persons & Assets/ Socio-economic baseline census
Upon identification of the need for involuntary resettlement in a sub-project, the project will carry out a census to identify the persons who will be affected by the sub-project. This will help the project to determine who will be eligible for assistance early enough in the project cycle. It will also help to prevent an inflow of ineligible people living outside the sub-project area of impact but who might want to take advantage and claim for assistance. The completion of the census will mark the cut off-date for eligibility for compensation which would be communicated to PAPs. Annex 3 shows a framework for the census of affected assets and people.

Consultations during resettlement action planning and implementation
Consultations with stakeholders including PAPs will be an integral part in the ARAP or RAP preparation, implementation and monitoring processes at all stages and stakeholders should have access to the ARAP/ RAP. Consultations should happen in local language where possible; women should be consulted separately if that is more appropriate. The consultation process should ensure sizeable participation of women, youth, and groups at risk of exclusion, and also ensure prior distribution of project information in a form that is accessible to community members, etc.
7.0 PROPERTY VALUATION AND COMPENSATION

7.1 Valuation of Properties

The purpose of the valuation is to assess the overall Compensation Payable as part of the assessment of resettlement related issues under the EDP. The scope of the valuation covers land, structures and crops/economic trees on the project sites to be affected. Loss of income or disruptions to livelihoods are considered as far as it may be appropriate for payment of compensation for the period of disruption of farming/livelihood/business.

7.1.1 Basis of Valuation

The basis of the valuation is derived from the World Bank’s Involuntary Resettlement Policy, OP 4.12; and the Constitution of Sierra Leone.

7.1.2 Valuation Methods and Compensation Rates

Table 4 provides the general guideline for cost preparation and method for valuing affected assets/properties taking. In this context, the compensation is the amount required, so far as money can do so, to put the owner or user of a land or building in the same position as if his/her use and enjoyment has not been disrupted. In other words, it is based on the principle of “Full Replacement Cost”.

Land

The Market Comparison Approach (MCA) will be adopted for the valuation of land if there is a vibrant and active land market. This approach involves the direct comparison of the property’s value determining features with those of the immediate and surrounding vicinity that sold recently. In applying this method, values of plots of land from the neighbourhood of the sites will be collected, compared, adjusted to take account of minor differences, and applied to arrive at the reported values. This is to ensure that the values obtained would be adequate to purchase alternative land or cash compensation for the affected owners. Alternatively, where there is no active land market the negotiation approach will be adopted. This is based on productive potential or agricultural or commercial land of equivalent size and location.

Structures

The full Replacement Cost Approach (RCA) will be adopted for the valuation of the structures. It involves finding the estimate of the gross replacement cost of a structure which is the estimated cost of constructing a substitute structure, having the same gross area as that existing, at prices current at the relevant date. For the purpose of this valuation, the affected assets/structures and development will not be depreciated in line with the World Bank requirements.

Crops/Economic Plants

The Enumeration Approach will be adopted for affected crops/economic trees under the project. The Enumeration Approach involves taking census of the affected crops (either by counting or area) and applying crop rates by the Ministry of Lands, Housing and Environment.
Updated valuation rates to be applied under the EDP will ensure that the crop rates compensate for the labour and equipment invested in the crop cultivation as well as the replacement cost of crops lost to ensure that the rates are in harmony with the full replacement value requirements.

### Table 4: General guidelines and methods for costs preparation

<table>
<thead>
<tr>
<th>Item</th>
<th>Types</th>
<th>Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land</td>
<td>Community lands, private lands</td>
<td>Prevailing market value of the land to be acquired if there is a vibrant and active land market. Otherwise a negotiated price will be agreed including Land for land replacement</td>
</tr>
<tr>
<td>Structures</td>
<td>Any type of structure, e.g. mud houses, wooden structures, sandcrete block houses, etc</td>
<td>Full Replacement Cost method. No depreciation will be applied.</td>
</tr>
<tr>
<td>Crops/Plants</td>
<td>Food and cash crops/economic plants (cassava, maize, etc)</td>
<td>Enumeration approach and applying updated MLHE rates. Crop rates will take care of labor and equipment invested in the crop cultivation as well as the replacement cost of crops lost</td>
</tr>
</tbody>
</table>
| Cultural heritage resources | Sacred groves, cemeteries, shrines   | 1. Option 1: Avoidance and an alternative site selected for project.  
2. Option 2: Relocation of shrine if possible or performance of necessary rituals/pacifications in consultation with and acceptable to the traditional authorities or community leaders.  
3. Option 3: Other options proposed by community/PAPs and agreed upon under the project including the Chance Find procedure provided in the ESMF. |
| Loss of income and livelihood | Businesses, farming etc.             | Estimation of net monthly/annual profit for business/farm based on records; application of net monthly/annual profit to the period when business/farm is not operating.  
Livelihood Restoration Plan will be prepared |
| Disturbance allowance       | -                                    | 5-10% of affected property value/compensation to be negotiated, based upon rates determined by the government agency for valuation. |

#### 7.1.3 Valuation Responsibility

The Department of Housing under the Ministry of Land, Housing and Environment (MLHE) together with the Survey Department under the Ministry of Works and Public Assets (MWPA) will be requested to value affected assets/properties based on the full replacement cost principle (which include transaction cost such as labour and transport cost). By their mandates, the Housing Department will be responsible for structures whereas the Survey Department will be responsible for land valuations. Certified private valuers may also be engaged where necessary especially involving private persons or if required to assist the process. These professional valuers to be used will be required to provide evidence where necessary that the rates applied are consistent with the “full replacement value” requirement.

#### 7.2 Other Considerations into the Compensation Package

**Livelihood Assistance/Loss of Income**
The estimation for loss of income (referred to as livelihood assistance) for affected businesses will be generally based on the following factors:
• Estimated income of business or daily sales of the business units; and
• Estimated period of construction or EDP activity which will disrupt business or commercial activity.

Losses of income for businesses will be estimated from net monthly/annual profit of the business verified by an assessment of visible stocks and activities.

Resettlement/Relocation Assistance
Where PAPs are to be physically displaced or relocated, resettlement assistance should be provided to take care of the transport cost of mobilizing and moving the affected properties to a new location and an accommodation assistance where affected persons will have to rent accommodation at the initial stages.

Disturbance Allowance
Cost of disturbance is one of the components to be considered when determining compensation for PAPs (especially for affected structures, crops and livelihoods). The application of between 5% and 10% of affected property value/compensation is recommended based on how big or small the compensation amount is. The rates will be approved by the Ministry of Lands, Housing and Environment (MLHE).

7.3 Types of Compensation

The types of compensation recommended for use in the implementation of the RPF include cash payment and in-kind compensation.

Cash payment: Cash payment compensation will be calculated and paid in Leones. Rates will be based on market value of land when known or estimated full replacement value of structures/crops.

b. In-kind compensation: In-kind compensation may include items such as land, buildings, building materials, and financial credit for equipment etc.

7.4 Compensation Payment/Claim

Compensation will be paid either by cash or cheque depending on the amount and in consideration of the security and safety of the PAPs, prior to vacating the land or property. For couples, compensation may be paid through joint accounts when the relationship is confirmed, and if it is possible. In cases where compensation will have to be paid in-kind, the project representative and the PAPs should confirm if such in-kind compensation has been received after releasing of land for project (e.g. release of land for construction of tourist facilities such as guest houses, washrooms, parking areas). PAPs will be given reasonable time to salvage any valuable items when vacating the site. In the event that, compensation is delayed, each eligible affected person will sign a compensation claim and commitment form (see Annex 4) together with the authorized project representative in the presence of a witness. The compensation claim form will clarify mutual commitments as follows:

• On the project side: commitment to pay the agreed compensation, including all its components (value of affected property- cash or in-kind, disturbance, assistance to business units to continue with activities and or relocation/transportation assistance if any); and
• On the affected person’s side: commitment to vacate or release the land by the agreed date.
8.0 IMPLEMENTATION ARRANGEMENTS AND RESPONSIBILITIES FOR RESETTLEMENT

8.1 Institutional Responsibilities

The main institutions involved with the implementation of the compensation/resettlement related activities are:

- Ministry of Finance - Project Coordination Unit (PCU)
- Ministry of Tourism and Cultural Affairs (MTCA) - National Tourist Board;
- Ministry of Trade and Industry - SME Development Agency
- Tourist communities
- Innovation Hubs
- Ministry of Lands, Housing and Environment (MLHE);
- Environmental Protection Agency (EPA);
- District Councils/Traditional Authorities/Ward Committees; and
- World Bank
- NGOs

The implementation activities will be under the overall guidance of the PCU. The responsibilities of the various institutions are presented in the table below.

Table 5: Institutional framework

<table>
<thead>
<tr>
<th>No.</th>
<th>Institution</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>Project Coordinating Unit</td>
<td>• Overall supervision of the RPF.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Trigger the process through screening and inventory of affected persons and assets and implement plan.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Coordinate RAP preparation and implementation as required.</td>
</tr>
<tr>
<td>2.0</td>
<td>MTCA/ NTB</td>
<td>• Assit with screening of subprojects and initial identification of PAPs</td>
</tr>
<tr>
<td></td>
<td>MTI/ SMEDA</td>
<td>• To assist with compensation negotiations (in kind) where necessary</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• To assist in grievance redress matters</td>
</tr>
<tr>
<td>3.0</td>
<td>Environmental Protection Agency (EPA)</td>
<td>• Review screening reports and advise on level of environmental assessment if necessary</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Assist with training and capacity building of other institutions</td>
</tr>
<tr>
<td>4.0</td>
<td>Ministry of Land, Housing and Environment (MLHE)/ Ministry of Public Works and Assets</td>
<td>• To undertake the valuation of affected properties and compensation due PAPs.</td>
</tr>
<tr>
<td>5.0</td>
<td>District Council, Traditional authorities, Ward Committees</td>
<td>• To assist with community awareness creation, notifications and support in the inventory of affected persons and compensation related issues and also assist in grievance redress matters</td>
</tr>
<tr>
<td>6.0</td>
<td>Consultants/NGO</td>
<td>• Prepare ARAP/RAP if necessary and assist with implementation and capacity building. However, this at the discretion of the PCU since preparation of instruments is the responsibility of the GoSL.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• NGO to assist with grievance management</td>
</tr>
<tr>
<td>7.0</td>
<td>World Bank</td>
<td>• To provide guidance and safeguards implementation support</td>
</tr>
</tbody>
</table>
The Ministry of Finance has the overall responsibility for preparing the RPF and implementing same with World Bank approval. It will ensure that all compensation and resettlement related matters are carried out satisfactorily before rehabilitation/construction works commences.

The District Councils where tourist sites will be developed will facilitate community orientation to fully understand and appreciate the processes and assist in implementation. Much of the work will be done at the district council level, and the Ward Committees being the local administrative authority with the support from NTB will further ensure that:

- Communities are properly and adequately informed (timely) by the NTB of the Plans, and also their rights and options relating to their properties that may be affected by the project and the compensation issues if any.
- Activities between different communities implementing the resettlement or compensation related plans are properly coordinated.
- Any grievances submitted by the affected persons are attended to as appropriate.
- Provide regular updates about project implementation through periodic reports.

The SMEDA will work with the Provincial authorities to select the location of the Solution centers and also the small and medium scale enterprises most suited for the project.

8.2 Resources, Technical Support and Capacity Enhancement

8.2.1 Resources available to deal with resettlement issues

The PCU and indeed the NTB and SMEDA have very limited human resources available to deal with resettlement related issues under the EDP. As a result, two (2) Safeguard Specialists (Social and Environment) will be engaged as part of the Project Coordination Unit, with adequate resources allocated to manage, monitor and report environmental and social risks and impacts. In addition, the EDP Coordination Unit will involve the NTB officers/ Wardens etc at where the projects will be undertaken as well as the District EPA to provide support to the Safeguards team towards the implementation of the RPF.

8.2.2 Technical support and capacity building

Compliance with World Bank policies needs some capacity building at the levels of both Project management (Project Coordination Unit) and Project implementers at the national and provincial/district level. A training programme is proposed as part of this RPF.

8.3 Priority Tasks

As soon as EDP sub-projects or activities and locations are determined in sufficient detail, preliminary screening of resettlement/ compensation related issues will be carried out to confirm (i) if land acquisition is involved, (ii) if implementation of subproject activities will impact on livelihoods and assets (structures, crops/economic plants and cultural heritage resources) of people and (iii) if implementation of subproject activities will also cause physical or economic displacement of people. If
any of these is triggered, then the number of affected people should be estimated to confirm the category of resettlement instrument (ARAP/RAP) to be prepared for implementation.

8.4 Preparation of ARAPs/RAPs and Setting up of Resettlement Management Teams

Where an ARAP or RAP is prepared for any EDP, subproject/activity, Resettlement Management Teams will be proposed and included in the documents. The resettlement management teams will consist of three smaller teams namely:

- Compensation Team;
- Grievance Redress Team; and
- Monitoring and Evaluation Team.

Where ARAPs/RAPs are required and have been approved by the World Bank for implementation, PCU in consultations with SMEDA/NTB will set up these resettlement management teams in line with the provisions in the ARAP/RAP. The Compensation Team will be responsible for organizing and ensuring that compensations due or payable to PAPs are made in line with the provisions and procedures of this RPF.

The Grievance Redress Team will be responsible for receiving and logging complaints and resolving disputes. The team will undertake follow-ups on all measures taken to resolve each grievance or dispute to ensure that redress actions are implemented by whoever is mandated to undertake such action. The Monitoring and Evaluation Team will be responsible for the monitoring of the resettlement instrument implementation to ensure that stated targets are met and project affected persons are duly compensated in line with the provisions in the resettlement instrument.

However, depending on the number of affected persons and the complexity of the issues, the Resettlement Management Team may provide all three services directly.
9.0 GRIEVANCE REDRESS MECHANISM

Grievance Redress Mechanism (GRM) involves the institutions, instruments, methods, and processes by which a resolution to a grievance is sought and provided. The consultations of project affected persons and other key stakeholders at the very early stages of project implementation will ensure that their concerns are taken care of during implementation and would help minimize disputes or conflicts arising from implementation of any project activity.

9.1 Objective

The objectives of the grievance process are to

• Provide affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation and determination of entitlements of compensation and implementation of the project;
• Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
• Avoid the need to resort to judicial proceedings.

Court cases are known to be cumbersome and time consuming. It is therefore proposed to make available a simple procedure for affected persons to be able to follow easily, and which will provide aggrieved people with an avenue for amicable settlement. Aggrieved people would however remain free to open a Court case without having registered their grievance as made possible by the Sierra Leonean constitution.

9.2 Potential sources of grievances/disputes

In practice, grievances and disputes that arise during the course of implementation of a resettlement/compensation program may be related to the following issues among others:

• Siting of the project/subproject;
• Mistakes in inventorying or valuing properties;
• Disagreement on property boundaries, either between the affected person and the expropriation agency or between two neighbours;
• Disputed ownership of a given asset (two or more affected people claim that the affected asset is theirs);
• Disagreement on asset valuation methods and compensation amounts in cash or in-kind;
• Successions, divorces, and other family issues resulting in disputed ownership or disputed shares between inheritors or family members including couples as to who should be given the cash compensation;
• Disagreement with the computation of the resettlement or livelihood assistance or transportation cost;
• Claims by people who relocated on their own after receiving notification about the project and the likelihood of impact on their activities; and
• Delays in resolving complaints of PAPs.
9.3 The Grievance Redress Process

The general steps of the grievance process comprise the following steps which will include a feedback process for complainants to get responses within agreed time frames:

- Registration/receipt of Complaints;
- Determining and Implementing the Redress Action;
- Verifying the Redress Action;
- Monitoring and Evaluation; and
- Dissatisfaction and Alternative Actions.

9.3.1 Registration/Receipt of complaints

The PCU will establish a register of resettlement/compensation related grievances and disputes. The receipt of complaints will include its logging and registration as this will help with monitoring the status of the grievances and ease reporting on them. The existence and conditions of access to this register (where, when, how) will be widely disseminated within the project community/town as part of the consultation undertaken for the project in general.

For the tourist project sites, the complaints will be lodged verbally or in writing directly by the affected person or through the local Headman/woman to the District Council Office representative designated to receive all complaints. The Ward Committee for the project area could also receive complaints from PAPs (because the Ward Committee is within the community and is closer to the PAPs and some PAPs may prefer to route their complaints through the Committee and avoid undue transport and time cost to the District office). The Committee will ensure that such complaints reach the District Office representative designated to receive complaints within 24 hours via phone call or through any other means. The person assigned the responsibility at the District Council shall receive all complaints and shall officially register these complaints using the first section of the proposed complaint registration and resolution form provided in Annex 5. The District Council Representative will inform the National Tourist Board representative (officer/ warden) on the Grievance Redress Team within 24 hours on any complaint lodged.

At the Solution Centers, the SMEDA safeguard person will be in regular contact with the operators of the Centers to ensure that any complaints are dealt with within designated time periods.

For cases involving gender based violence, the GBV outreach staff who will be stationed in project communities will intervene and ensure that satisfactory actions as proposed in the ESMF, are taken to support the survivor.

9.3.2 Determining and implementing the redress action

When a grievance/dispute is recorded as per above-mentioned registration procedures, the Grievance Redress Team (GRT) will be called into action, and mediation meetings will be organized with interested parties. Minutes of meetings will be recorded.
The GRT will first investigate the foundation of the grievance and then determine the redress action in consultation with the complainant and concerned party if necessary. Otherwise, the grievance redress team will communicate to the complainant on the acknowledgement of the grievance, the redress action proposed and the timeframe for implementation.

The proposed redress action and the timeframe in which it is to be implemented will be discussed within 5 working days of receipt/registration of the grievance. The grievance issue should be resolved within 10 working days of receipt of complaints.

9.3.3 **Verifying the redress action**

The grievance redress team will visit the affected property site or get in touch with the complainant to confirm that the redress action is carried out. If the complainant is dissatisfied with the outcome of the redress proposal or action, additional steps may be taken to resolve the issue or reach an amicable agreement. Verification should be completed within one week of execution of the redress action.

9.3.4 **Monitoring and Evaluation**

The Monitoring and Evaluation Team will monitor the activities of the Grievance Redress Team to ensure that complaints and grievances lodged by PAPs are followed-up and resolved amicably as much as possible.

9.3.5 **Dissatisfaction and Additional Steps**

2\textsuperscript{nd} Tier Amicable Mediation and Settlement

If the complainant is not satisfied with the decision of the grievance redress team, he/she can bring it to the attention of the Safeguard Officer at the PCU to draw the attention of PCU to the unresolved grievance. Otherwise the GRT should forward the issue directly to PCU for further action. The PCU In consultation with the Ministry of Finance will set up an appropriate mediation team to resolve the issue within 2 weeks from the date of receipt of such a decision by PCU. If such a time line is not possible, the PCU should inform the GRT and the complainant accordingly giving reasons and possible new date.

**Appeal to Court**

If the complainant remains dissatisfied with the mediation effort of EDP PCU and the MTCA/ SMEDA, the complainant has the option to pursue appropriate recourse via judicial process in Sierra Leone. The Constitution allows any aggrieved person the right of access to Court of law. Courts of law will be a “last resort” option, in view of the above mechanism.

9.4 **Membership, Function and Financing of the GRT**

The Grievance Redress Team (GRT) will include the following:
- Representative of the National Tourist Board (Officer/ Guide/ Warden)
- Representative of the relevant District Council;
- Representative of the Ward Committee for the project area; and
- Representative of the traditional authority.
The Tourist Board and the District Council should ensure that at least one of the GRT members is a woman. In addition to the main function of resolving grievances, disputes, complaints and conflicts, the GRT will also:

i. Ensure smooth implementation of the resettlement instrument;
ii. Establish dialogue with the PAPs; and
iii. Ensure that their concerns and suggestions are incorporated and implemented during the project.

The grievance redress teams will be made known or be set up as soon as land acquisition or resettlement plan preparation starts. Disputes can arise from census operations and preliminary siting of subprojects and it is therefore important that the mediation mechanisms be available to cater for claim, disputes and grievances at the early stage. The activities of the GRT will be financed by PCU.

9.5 Schedule Template for Grievance Redress and Institutional Responsibilities.

The table below presents a summary of the grievance redress procedure with institutional roles and responsibilities.

<table>
<thead>
<tr>
<th>Steps</th>
<th>Process</th>
<th>Description</th>
<th>Time frame</th>
</tr>
</thead>
</table>
| 1.    | Grievance receipt and registration/ logging | -Face to face; phone; letter, recorded during public/ community meetings; recorded from Ward Committee, etc. 
-Significance assessed and grievance recorded or logged using the model complaint form and filed. | 1-2 Days   |
| 2.    | Development and implementation of response | -GRT meets or takes a decision on the grievance 
-Grievance assigned to appropriate party for resolution if necessary 
-Response development with input from relevant stakeholders 
-Redress response/action approved by GRT and logged 
-Redress response/update of progress on resolution communicated to the complainant 
-Start implementing redress action | 5-10 Days  |
| 3.    | Verifying the implementation of redress action | -Redress action implemented and verified by GRT. 
-GRT satisfied with implementation of redress action | 10-15 Days |
| 4.    | Close grievance or refer grievance to 2nd tier resolution | -Completion of redress action recorded or logged 
-Confirm with complainant that grievance can be closed or determine what follow up is necessary 
-Record final sign off of grievance 
If grievance cannot be closed, return to step 2 or recommend 2nd level settlement | 10-15 Days |
| 5.    | Court of law | -If 2nd level settlement does not address dispute, complainant can resort to court of law | Unknown    |
| 6.    | Monitoring and evaluation, and reporting | Grievance Redress Mechanism Process is documented and monitored | -          |
10.0 STAKEHOLDER CONSULTATIONS, PARTICIPATION AND PUBLIC DISCLOSURE

10.1 Stakeholder Consultations Carried Out

The key stakeholders were engaged at various times and occasions to discuss resettlement issues that may arise from the implementation of the EDP, as well as gain an insight into the legal and institutional framework available to support its implementation. A report on the consultation is provided in the Annex 6 which includes the few concerns and issues raised by the various stakeholders. These have been incorporated in the report and possible mitigation measures have been included. The stakeholders were engaged within their respective communities and also in government institutions during May 2018 and also in May 2019. Generally, all the communities sampled for consultation were pleased with the project intention and are confident that, if they are given the necessary support to manage the tourist sites as purported by the project, their living conditions would improve drastically. They are willing to provide land for the project and other needed assistance to bring the project to fruition.

Table 7: Some key organizations/ communities engaged during May 2018 and May 2019 for the RPF

<table>
<thead>
<tr>
<th>No</th>
<th>Organization/ Community</th>
<th>Persons consulted and Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Ministry of Finance</td>
<td>Alimany Bangura, Director of Economic Policy and Research Unit</td>
</tr>
<tr>
<td>2</td>
<td>Ministry of Tourism and Cultural Affairs</td>
<td>Mohamed Jalloh, Director of Tourism</td>
</tr>
<tr>
<td>3</td>
<td>Ministry of Works, Housing and Infrastructure</td>
<td>Abu Bakarr Jalloh, Director of Housing</td>
</tr>
</tbody>
</table>
| 4  | Ministry of Works, Housing and Infrastructure | Alphasor Bah, Snr Quantity Surveyor  
Ajah Fillie-Faboe, Chief Building Inspector  
Tamba P. Ngegba, Senior Building Inspector |
| 5  | Ministry of Transport and Aviation      | Abdul S. Sanusi, Planning Officer                                                                |
| 6  | National Tourist Board                 | Fatmata Abe-Osagin, Deputy General manager  
Umaru Woody, Planning and Development Manager  
Yassin Kargbo, General manager |
| 7  | SME Development Agency                 | Sharka Sannoh, CEO                                                                               |
| 8  | Tacugama Chimpanzee Sanctuary          | Aram Kazandjar, Manager                                                                           |
| 9  | No. 2 River Development Association    | Daniel Macauley, Secretary General; Victor Harding, Chairman;  
Yusufu O. Dumbuya, Barman; Theophilus Mansuray, Elder                                              |
| 10 | Pottor Levuma Beach Organization       | Alhaji M. Bangura, Member; Jane Turay, Chair Lady, Ward Committee;  
Santigie Kargbo, Organizing Secretary                                                              |
| 11 | Lakka Community                        | Tommy Douglas, Land/ Business Owner                                                               |
| 12 | Banana Island                          | Eric Thompson, Deputy Headman  
Roland Cole, Community member                                                                       |
| 13 | Bureh Beach Surf Club                  | Abu Douglas Diaby, General Manager                                                                |
| 14 | York Town                              | Julrick Pratt, Headman                                                                             |
| 15 | Innovation Hub                         | Morris Marrah, General Manager                                                                     |
| 16 | NGO- Rainbo Initiative                 | Daniel Kettor, Executive Director                                                                  |
Stakeholder consultation or engagement is a process and EDP PCU will continue with the engagement throughout the project implementation phase in collaboration with the implementing agencies as well as the respective District Councils.

10.2 Consultation and Disclosure Requirements for the Resettlement Policy Framework

The resettlement instrument will be disclosed in compliance with World Bank operational policy, OP 4.12, which states that:

“As a condition of appraisal of projects involving resettlement, the borrower provides the Bank with the relevant draft resettlement instrument which conforms to this policy, and makes it available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to them. Once the Bank accepts this instrument as providing an adequate basis for project appraisal, it will be public disclosed across country and copies also deposited at selected locations for accessibility. The approved document will also be disclosed on the website of the World Bank.”

The consultations and Public Disclosure of the RPF will be undertaken by the PCU of the EDP and will be organized as follows:

- Circulation of the draft RPF for comments to all relevant institutions (e.g. PCU, relevant MTCA directorates involved with the EDP, Ministry Of Land, Housing and Environment (MLHE), Ministry of Works and Public Assets (MWPA), Environmental Protection Agency, and the World Bank);
- Communication of comments to the Consultant for incorporation into a final RPF, together with World Bank comments; and
- Public Disclosure of final RPF (after reviewed and cleared by both GoSL & World Bank) both in-country (e.g. hard copies to be sent relevant District Councils, District EPA offices, project communities, community libraries) and at the World Bank and MTCA websites. Twenty-one (21) days will be allowed for the public to submit their comments if any, on the document.

10.3 Community Consultation and Citizen’s Engagement Strategy

Community consultation and participation will afford the PAPs an opportunity to contribute to both the design and implementation of the activities related to the sub-projects. In so doing, the likelihood for conflicts between the affected person and the project implementers will be reduced. In recognition of this, particular attention will be paid to public consultation with any PAPs, households and homesteads (including host communities/institutions) when resettlement and compensation concerns are involved.

As a matter of strategy, public consultation shall be an on-going activity taking place throughout the entire project cycle. Hence, community/public consultation will take place at the following stages as described in Table 8: project inception and planning, screening process, feasibility study, preparation of project designs, resettlement and compensation planning, implementation of RAP/ARAP (drafting and reading/signing of the compensation contracts, payment of compensations, resettlement activities), and implementation of after-project community support activities.
<table>
<thead>
<tr>
<th>No.</th>
<th>Activity</th>
<th>Identified Stakeholders</th>
<th>Focus of Consultation/ Engagement</th>
<th>Timelines/ Frequency</th>
<th>Forms of communication</th>
<th>Facilitator</th>
</tr>
</thead>
</table>
| 1.  | Preparation of RPF/ project design and planning | Ministry of Finance  
Ministry of Tourism and Cultural Affairs (Tourism Directorate)  
National Tourist Board  
Ministry of Trade and Industry- SMEDA  
Project Coordinating Unit  
Project Communities | • Scope of activities proposed for sub-components.  
• Institutional arrangements for project implementation (including roles and responsibilities)  
• Confirmation of project stakeholders (including beneficiaries).  
• Identification of activities from sub-components with potential resettlement related issues of concern.  
• Potential resettlement related issues of concern from implementation the proposed projects and sub-projects  
• Compliance with World Bank, EPA and MLHE requirements for project sub-components  
• Strategies for mitigating the potential impacts and implementation of RAP/ARAP | Throughout the RPF study period/ project inception and planning | • One on one Interviews  
• Local meetings  
• Focus group meetings  
• Field visits  
• Sharing and review of relevant reports  
• Email and phone calls | Tourism Directorate;  
SMEDA  
Resettlement Consultant |
| 2.  | Screening process | Ministry of Finance (PCU)  
Ministry of Tourism and Cultural Affairs (Tourism Directorate)  
National Tourist Board  
Ministry of Trade and Industry- SMEDA  
Project Communities | • Confirmation of scope of activities proposed for sub-components.  
• Confirmation of institutional arrangements for project implementation (including roles and responsibilities)  
• Confirmation of project stakeholders (including beneficiaries).  
• Confirmation of activities from sub-components with potential resettlement related issues of concern.  
• Potential resettlement related issues of concern from implementation the proposed projects and sub-projects | Throughout the screening study period | • One on one Interviews  
• Local meetings  
• Focus group meetings  
• Field visits  
• Sharing and review of relevant reports  
• Email and phone calls | Tourism Directorate;  
SMEDA  
Resettlement Consultant |
<table>
<thead>
<tr>
<th>No.</th>
<th>Activity</th>
<th>Identified Stakeholders</th>
<th>Focus of Consultation/ Engagement</th>
<th>Timelines/ Frequency</th>
<th>Forms of communication</th>
<th>Facilitator</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>sub-projects</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Confirmation of number of project affected persons (PAPs) and determination of the extent of resettlement planning.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Compliance with World Bank, EPA and MLHE requirements for project sub-components</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Strategies for mitigating the potential impacts and implementation of RAP/ARAP</td>
<td></td>
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</tr>
</tbody>
</table>
| 3.  | Technical and financial feasibility study/ Preparation of project designs for sub-projects | • NTB/ SMEDA officers  
• Communities  
• Youth and Women Groups  
• District Councils  
• Traditional Authorities  
• Ward Committees  
• PAPs | • Confirmation of scope of activities proposed for sub-components.  
• Confirmation of institutional arrangements for project implementation (including roles and responsibilities)  
• Confirmation of project stakeholders (including beneficiaries).  
• Confirmation of activities from sub-components with potential resettlement related issues of concern.  
• Potential resettlement related issues of concern from implementation the proposed projects and sub-projects  
• Confirmation of number of project affected persons (PAPs) and determination of the extent of resettlement planning.  
• Compliance with World Bank, EPA and MLHE requirements for project sub-components  
• Strategies for implementation of RAP/ARAP  
• Integration of RAP/ARAP into project scheduling. | Throughout the design and feasibility period | • One on one interviews  
• General meeting/ possible door to door sensitization.  
• Focus group meetings  
• Field visits  
• Sharing and review of relevant reports  
• Email and phone calls | • Tourism Directorate;  
• SMEDA  
• Consultants |
<p>| 4.  | Resettlement and | • PAPs | • List of PAPs | Prior to | • One on one | • Tourism |</p>
<table>
<thead>
<tr>
<th>No.</th>
<th>Activity</th>
<th>Identified Stakeholders</th>
<th>Focus of Consultation/ Engagement</th>
<th>Timelines/Frequency</th>
<th>Forms of communication</th>
<th>Facilitator</th>
</tr>
</thead>
</table>
|     | compensation planning | • Youth and Women’s Group  
• NTB Officers  
• District Councils  
• Traditional Authorities  
• Ward Committees | • Eligibility for compensation and entitlement  
• Schedule and procedures for resettlement and compensation payment  
• Institutional arrangement for RAP/ARAP implementation  
• Grievance redress mechanism  
• Community awareness creation, notifications and support in the inventory of affected persons and compensation related issues.  
• Capacity building for stakeholders for the implementation of the RAP/ARAP | commencement of works | Interviews  
• General meeting/ possible door to door sensitization.  
• Radio discussion  
• Sharing and review of relevant reports  
• Newspaper publications | Directorate  
• NTB  
• EPA  
• Consultants/ NGOs |
| 5.  | Implementation of RAP/ARAP | • PAPs  
• Youth and Women’s Groups  
• NTB/ SMEDA Officers  
• District Councils  
• Traditional Authorities  
• Ward Committees | • List of PAPs  
• Eligibility for compensation and entitlement  
• Schedule and procedures for resettlement and compensation payment  
• Institutional arrangement for RAP/ARAP implementation  
• Grievance redress mechanism  
• Community awareness creation, notifications and support in the inventory of affected persons and compensation related issues.  
• Capacity building for stakeholders for the implementation of the RAP/ARAP | Prior to commencement of works | One on one  
Interviews  
• General meeting/ possible door to door sensitization.  
• Complaints desk  
• Sharing and review of relevant reports  
• Newspaper publications  
• Radio discussion | Tourism Directorate  
• NTB  
• SMEDA  
• MLHE  
• MPWA  
• EPA  
• Consultants/ NGOs |
| 6.  | Implementation of after-project community | • PAPs  
• Youth and Women’s Groups | • Institutional arrangement for RAP/ARAP implementation  
• Grievance redress mechanism | Project implementation period | • General meeting.  
• Workshops | Tourism Directorate  
• SMEDA |
<table>
<thead>
<tr>
<th>No.</th>
<th>Activity</th>
<th>Identified Stakeholders</th>
<th>Focus of Consultation/ Engagement</th>
<th>Timelines/ Frequency</th>
<th>Forms of communication</th>
<th>Facilitator</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>support activities (including monitoring)</td>
<td>• District Councils</td>
<td>• Capacity building for stakeholders for the implementation of the RAP/ARAP</td>
<td></td>
<td>• Complaints desk</td>
<td>NTB</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Traditional Authorities</td>
<td></td>
<td></td>
<td>• MLHE</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Ward Committees</td>
<td></td>
<td></td>
<td>• MPWA</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• EPA</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>• Consultants/ NGOs</td>
<td></td>
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<tr>
<td></td>
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<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>
10.4 Identification of Vulnerable Groups

Vulnerable groups are those who may be adversely affected by displacement, compensation, and resettlement process and yet do not have the voice or ability to participated in the project benefits. There may also be some PAPs who are already vulnerable based on their existing conditions such poor health, disability, old age etc. project impact could worsen their condition. The project will identify such persons during census for the preparation of the Resettlement Action Plan (RAP) or Abbreviated Resettlement Plan (ARAP) when project scope and activities are properly identified and confirmed. The project will pay attention to the conditions of the following categories during implementation:

- The elderly, usually from 70 years and above;
- Widows, Women and children;
- Unemployed youth and people below poverty line
- Physically challenged persons and Unemployed youth
- Mentally challenged/highly depressed persons;
- Affected Persons who are too ill, bedridden, hospitalized or stricken with HIV/AIDS;
- Female heads of households; and
- Migrant/settlers without proper land documents.

10.5 Assistance to Vulnerable People

Assistance to vulnerable persons will be outlined in the RAP following the census and may take various forms depending on the circumstance of their vulnerability and needs. Assistance to vulnerable people may include but not limited to the following:

- Assistance in financial literacy training especially for women and assistance in compensation payment procedures (e.g. going to the bank with them to cash the compensation cheque);
- Assistance in the post payment period to secure the compensation money and reduce risks of misuse/robbery;
- Assistance in moving: providing vehicle, driver and assistance at the moving stage;
- In kind compensation payment,
- Assistance to migrant/settlers without proper land documents in finding alternative sites for their activities;
- Assistance in building: providing materials, workforce, or building houses; and
- Access to Health care if required for critically ill PAPs
- moving and rent subsidy for transition period.

10.6 Provisions to be made in RAPs/ARPs

Vulnerable people will be identified at census stage. Each RAP or ARAP developed under the EDP if any should make precise provisions with respect to assistance to vulnerable groups. Identification of vulnerable people and identification of the cause and impacts of their vulnerability, either through
direct interviews by the RAP/ARAP consultant or the NTB officers at the project inception stage or RAP/ARAP stage is critical because often vulnerable people do not participate in community meetings, and their disability/vulnerability may remain unknown. Local community leadership should be involved in the determination of who is vulnerable and by what criteria.
11.0 BUDGET AND FUNDING

11.1 Estimated Budget to Implement RPF

The estimated budget for implementing the RPF is presented in Table 9 below. The RPF will be the basis for the preparation and implementation of RAP/ARAP where required.

<table>
<thead>
<tr>
<th>No.</th>
<th>Activity</th>
<th>Description</th>
<th>Item</th>
<th>Unit cost, US$</th>
<th>No</th>
<th>Total Cost, US$</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>Cost of GRM</td>
<td>GRM establishment and training</td>
<td>Digital platform and GRM committee</td>
<td>lumpsum</td>
<td>10,000</td>
<td></td>
</tr>
<tr>
<td>2.0</td>
<td>Training and Sensitization/Awareness Creation</td>
<td>Ministry of Finance, MTI, MTCA (relevant directorates and other national stakeholders)</td>
<td>Workshop</td>
<td>5,000.00</td>
<td>1</td>
<td>5,000.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SMEDA, NTB officers/wardens etc, District Councils</td>
<td>Provincial, District Workshops</td>
<td>3,000.00</td>
<td>4</td>
<td>12,000.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td>CSOs, NGOs and Contractors</td>
<td>District Workshops</td>
<td>3,000</td>
<td>4</td>
<td>12,000.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Radio Discussions</td>
<td>Local radio stations</td>
<td>2,000.00</td>
<td>-</td>
<td>2,000.00</td>
</tr>
<tr>
<td>3.0</td>
<td>RPF Disclosures</td>
<td>Disclosure of RPF - Advertisements</td>
<td>National Dailies</td>
<td>LS</td>
<td>-</td>
<td>2,000.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Disclosure of RPF – copies to stakeholders</td>
<td>All relevant stakeholders</td>
<td>LS</td>
<td>-</td>
<td>2,000.00</td>
</tr>
<tr>
<td>4.0</td>
<td>External Monitoring and Evaluation</td>
<td>Local Consultant</td>
<td>Lump sum fees</td>
<td>5,000.00</td>
<td>1</td>
<td>5,000.00</td>
</tr>
<tr>
<td>5.0</td>
<td>TOTAL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>50,000.00</td>
</tr>
</tbody>
</table>
The budget will be developed from the specific social surveys and mitigation/livelihood restoration measures to be developed under the preparation of the ARAP or RAP. It will cover resettlement activities including compensation cost for affected assets.

The cost will be derived from expenditures relating to (1) the preparation of the resettlement instrument, (2) relocation and transfer, (3) income losses and livelihood restoration plan, and (4) administrative costs. These bullet points give the cost centres:

Preparation of resettlement instrument (e.g. ARAP or RAP)
- Cost of survey of affected persons, valuation and inventory of assets
- Compensation payments for affected assets
- Fees of consultants/NGO to be engaged

Relocation Issues, if relevant
- Cost of moving and transporting items
- Cost of site and infrastructure development and services
- Subsistence allowance during transition
- Cost of replacement of businesses and downtime

Income and means of livelihood restoration plans
- Cost of estimating income losses and livelihood assistance
- Cost for Implementing the Grievance Redress Mechanism (GRM)
- Cost for Monitoring and Evaluation of the RAP

Administrative costs
- Operation and support staff
- Training and monitoring
- Technical assistance

Table 10 is a template for the itemization of budgets to be prepared under the resettlement plans with mainly cash compensation in mind as physical relocation and associated costs are not anticipated. The template could be modified to suit local situation.

<table>
<thead>
<tr>
<th>#</th>
<th>ITEM</th>
<th>Leones</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td><strong>PREPARATORY PHASE COST</strong></td>
<td></td>
</tr>
<tr>
<td>1.1</td>
<td>Inventory of affected persons, assets and livelihoods</td>
<td></td>
</tr>
<tr>
<td>1.2</td>
<td>Valuation fees (MLHE or private valuer)</td>
<td></td>
</tr>
<tr>
<td>1.3</td>
<td>Preparation of resettlement plans or compensation reports</td>
<td></td>
</tr>
<tr>
<td>1.4</td>
<td><strong>Subtotal 1 (Preparatory phase cost)</strong></td>
<td></td>
</tr>
<tr>
<td>2.0</td>
<td><strong>COMPENSATION COST</strong></td>
<td></td>
</tr>
<tr>
<td>#</td>
<td>ITEM</td>
<td>Leones</td>
</tr>
<tr>
<td>----</td>
<td>----------------------------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>2.1</td>
<td>Compensation for permanent acquisition of land</td>
<td></td>
</tr>
<tr>
<td>2.2</td>
<td>Compensation for temporary occupation of land</td>
<td></td>
</tr>
<tr>
<td>2.3</td>
<td>Compensation for destruction of standing crops</td>
<td></td>
</tr>
<tr>
<td>2.4</td>
<td>Compensation for destruction of permanent immovable structures</td>
<td></td>
</tr>
<tr>
<td>2.5</td>
<td>Compensation for temporary displacement of moveable structures</td>
<td></td>
</tr>
<tr>
<td>2.6</td>
<td>Subtotal 2 (Compensation cost)</td>
<td></td>
</tr>
<tr>
<td>3.0</td>
<td>LIVELIHOOD RESTORATION /MITIGATION MEASURES COST</td>
<td></td>
</tr>
<tr>
<td>3.1</td>
<td>Compensation for PAPs loss of income</td>
<td></td>
</tr>
<tr>
<td>3.2</td>
<td>Compensation for business persons loss of income</td>
<td></td>
</tr>
<tr>
<td>3.3</td>
<td>Cost of special assistance to vulnerable persons</td>
<td></td>
</tr>
<tr>
<td>3.4</td>
<td>Subtotal 3 (Livelihood restoration/mitigation cost)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cost of estimating income losses and livelihood assistance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cost for Implementing the Grievance Redress Mechanism (GRM)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cost for Monitoring and Evaluation of the RAP</td>
<td></td>
</tr>
<tr>
<td>4.0</td>
<td>CAPACITY BUILDING &amp; IMPLEMENTATION COST</td>
<td></td>
</tr>
<tr>
<td>4.1</td>
<td>Capacity building for key stakeholders</td>
<td></td>
</tr>
<tr>
<td>4.2</td>
<td>Disclosure of resettlement instrument</td>
<td></td>
</tr>
<tr>
<td>4.3</td>
<td>Logistical support and engagement of Safeguard Officer</td>
<td></td>
</tr>
<tr>
<td>4.4</td>
<td>Cost for compensation disbursement/grievance redress/monitoring &amp;</td>
<td></td>
</tr>
<tr>
<td></td>
<td>evaluation activities</td>
<td></td>
</tr>
<tr>
<td>4.5</td>
<td>Legal fees (in case of court dispute)</td>
<td></td>
</tr>
<tr>
<td>4.6</td>
<td>Subtotal 4 (Capacity building &amp; implementation cost)</td>
<td></td>
</tr>
<tr>
<td>5.0</td>
<td>TOTAL COST (addition of all subtotals)</td>
<td></td>
</tr>
<tr>
<td>6.0</td>
<td>CONTINGENCY (5%-10% OF TOTAL COST)</td>
<td></td>
</tr>
<tr>
<td>7.0</td>
<td>GRAND TOTAL COST (Total Cost + Contingency)</td>
<td></td>
</tr>
</tbody>
</table>

11.3 **Sources and Arrangements for funding**

Compensation, land acquisition and resettlement related issues will be funded by the Government of Sierra Leone. The Ministry of Finance is expected to make funds available to the sector ministries i.e. the Ministry of Tourism and Cultural Affairs (MTCA) and Ministry of Trade and Industry (MOTI) for the payment of compensation. Considering the country’s debt stress, the project will also consider the options of obtaining waivers to use project funds for compensation payment.
12.0 MONITORING AND EVALUATION

12.1 Objectives of Monitoring and Evaluation

Monitoring and Evaluation are key components of the RPF. The general objectives are:
- Screening and identifying subproject activities that require the preparation of an ARAP or RAP;
- Monitoring of specific situations or difficulties arising from implementation, and of the compliance with the objectives of the RPF and methods as set out in this RPF;
- Evaluation of the impacts of the Resettlement/Compensation Actions on PAPs livelihood, environment, local capacities, on economic development and local communities.

Monitoring aims to identify and address implementation challenges during the course of the project, as required, while evaluation is intended at checking at the resettlement benefits that have been delivered to PAPs to ensure the output or outcome are consistent with the resettlement policies of the world Bank and relevant country laws. Monitoring and Evaluation reports will provide lessons for amending strategies and implementation in a longer-term perspective.

12.2 Internal Monitoring

12.2.1 Scope and Content

Monitoring will address the following aspects:
- Social and economic monitoring:
  - Status of displaced or affected persons,
  - Status of individuals benefitting from the EDP activities,
  - Re-establishment of livelihoods of affected persons;
- Technical monitoring: supervision of infrastructure and housing construction where relevant;
- How Grievances and complaints are managed;
- Implementation of consultation strategy; and
- Follow up on livelihood restoration and status of business re-establishment of displaced persons.

12.2.2 Monitoring indicators

The PCU Safeguards Specialist, in collaboration with the SMEDA and NTB officers, will keep the following statistics on an annual basis:
- Number of subprojects screened on environmental and social safeguard grounds.
- Number of subprojects with RAPs or ARPs;
- Number of RAPs or ARAPs implemented according to schedule;
- Number/frequency of safeguard supervision and annual Project reviews undertaken.
- Numbers of households/individuals affected by the EDP Project activities;
- Number of individuals physically or economically displaced;
- Numbers of households/individuals benefitting from the EDP activities;
- Number of women benefitting from the EDP activities;
• Number of youth (between the ages of 15 and 35 years) benefitting from the EDP activities;
• Number and sizes of individual, family or stool lands acquired for the EDP activities;
• Amounts of compensation paid; and
• Number of grievances registered and number resolved.

**Reporting**

The internal monitoring unit (comprising the PCU Safeguards Specialist and the project M&E Officer) will submit quarterly reports or as agreed to PCU. The report will at least cover status of compensation disbursement, nature of complaints, redress actions and follow-ups. An annual monitoring report will also be developed internally based on periodic reports.

### 12.3 Internal Evaluation

#### 12.3.1 Evaluation objectives

Reference documentation for the evaluation will be the following:

- This Resettlement Policy Framework;
- The Sierra Leonean laws and regulations as described in this RPF;
- The applicable World Bank Safeguard Policies, i.e. OP 4.12 “Involuntary Resettlement”; and
- Any ARAP or RAP prepared for the EDP activities if any.

The evaluation has the following specific objectives:

- General assessment of the compliance of the implementation of resettlement activities with objectives and methods as set out in this RPF;
- Assessment of the compliance of the implementation of resettlement activities with laws, regulations and safeguard policies as stated above;
- Assessment of resettlement and compensation procedures as they have been implemented;
- Evaluation of the impact of the resettlement and compensation programs on incomes and standard of living, with focus on the “no worse-off if not better-off” requirement;
- Identification of actions to take as part of the on-going monitoring to improve the positive impacts of the programme and mitigate its possible negative impacts, if any.

Evaluation of resettlement and compensation activities will be part of general assessment and review activities undertaken for the EDP activities as a whole by the PCU. Internal evaluation arrangements will be carried out for the implementation of ARAPs/RAPs.

### 12.4 External Monitoring and Evaluation

The supervision of safeguards implementation for the Project will be done by the WB as part of the overall project implementation in conjunction with the Social and Environmental Safeguards Specialists at the PCU, and relevant experts involved in environmental and social mitigation.
The PCU may engage a local consultant to carry out external monitoring and evaluation of the RPF or any RAP/ARAP developed and implemented under the EDP. The Independent External Evaluation (IEE) will be done soon after the completion of an ARAP or RAP implementation and reported. The independent evaluation will determine:

- If all sub-project has been screened for Environmental and Social Risks
- If the right safeguards instrument has been prepared for sub-project that trigger involuntary resettlement
- If compensation payments have been completed in a satisfactory manner;
- If there are improvements in livelihoods and well-being of PAPs; and
- If grievances or conflicts emanating from the EDP have been successfully resolved.

Several indicators will be used to measure these impacts. These include, among others,

(i) Comparison of income levels of PAPS before-and-after the RPF and or ARAP/RAP implementation;
(ii) Comparison of income levels of individuals benefitting from the EDP;
(iii) Livelihoods and employment assistance offered under the EDP and other accessible alternative incomes;
(iv) Changes in standards of living/housing conditions of PAPs;
(v) Number of grievances and their status, time and quality of resolution;
(vi) Number of vulnerable people/groups identified and assisted and impact of resettlement assistance provided on them;
(vii) Number of demolitions if any after giving notice if any, and
(viii) Number of PAPs paid in a given period in comparison with what was planned.

12.5 Completion Audit

Upon completion of RAP/ARAP implementation, an assessment to determine whether the objectives of the resettlement instrument have been achieved will be carried out. Evaluation is intended at checking whether policies have been complied with and providing lessons learnt for amending strategies and implementation in a longer-term perspective. The completion audit will allow the Ministry of Finance, PCU, NTB, SMEDA and other relevant stakeholders, EPA to verify that all resettlement/compensation related measures identified in the RPF and any RAP/ARAP developed for that purpose were implemented or otherwise, and that compensation programmes have been completed in compliance with OP 4.12.

The audit will also evaluate and ensure that the actions prescribed in the RPF and any RAP/ARAP and implemented had the desired effect. The PCU may engage a local consultant to carry out the completion audit. The completion audit is to be undertaken after completing implementation of the RAP/ARAP or when required to ascertain reported infractions in the RAP implementation process.
ANNEXES

Annex 1: Screening checklist
Annex 2: ToR for the ARAP/ RAP
Annex 3: Census template
Annex 4: Claim and commitment form
Annex 5: Complaint registration and resolution
Annex 6: Stakeholder consultation report
### ANNEX 1: SCREENING CHECKLIST

<table>
<thead>
<tr>
<th>A</th>
<th>PROJECT NAME:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Project Location (Province, District, Town)</td>
</tr>
<tr>
<td>2</td>
<td>Safeguard officer filling Form</td>
</tr>
<tr>
<td>3</td>
<td>Date of Screening</td>
</tr>
</tbody>
</table>

#### B DESCRIPTION OF ACTIVITY

| 1 | Type of Activity (including objectives and outputs) |
| 2 | Land area to be taken by project activity, in ha |
| 3 | Any existing property to be affected, and by how much (total, partial demolition etc.) |
| 4 | Any plans for construction, movement of earth, changes in land cover |
| 5 | Date of commencement and expected completion date and estimated cost |

#### C PRELIMINARY ENVIRONMENTAL INFORMATION

| 1 | Is there adjacent/nearby critical natural habitat? |
| 2 | Are there activities at the project site? |
| 3 | What is the current land use |
| 4 | Will the proposed activities have any impact on any ecosystem services, biodiversity issues or natural habitats? |
| 5 | Will there be restrictions or loss of access to community facilities or resources? |
| 6 | Will there be restrictions or loss of access to community facilities or resources? |
| 7 | Any cultural heritage/sacred sites in project area? |

#### D PRELIMINARY SOCIAL INFORMATION

| 1 | Has there been litigation or complaints of any environmental nature directed against the proponent or subproject? |
| 2 | Will the subproject require the acquisition of land? |
| 3 | What is the status of the land holding required by the project (customary, lease, community lands, etc.)? |
| 4 | Is there evidence of land tenure status of landowners and/or occupants (affidavit, other documentation)? |
| 5 | Are there outstanding land disputes? |
| 6 | Has there been proper consultation with stakeholders? |
| 7 | Is there a grievance process identified for PAPs and is this easily accessible to these groups/individuals? |
| 8 | Will there be any changes to livelihoods? |
| 9 | What are the main issues associated with |
### E IMPACT IDENTIFICATION AND CLASSIFICATION

<table>
<thead>
<tr>
<th></th>
<th>Livelihood</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>LOW (No livelihoods affected, short project duration and persons may revert to business activities immediately)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>MEDIUM (Livelihoods affected and persons may require some minimal assistance)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>HIGH (Livelihoods affected and compensation payments required)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Land tenure</td>
<td>Comment</td>
</tr>
<tr>
<td>2</td>
<td>LOW (No conflicts, disagreements around use of land)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>MEDIUM (Process of land regularization and rights to natural resources being worked out with clear communication and grievance process in place)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>HIGH (Land conflicts historically unresolved, community/persons being evicted, settlers loosing rights and no transparency or grievance redress available)</td>
<td></td>
</tr>
</tbody>
</table>

### F SUMMARY OF SITE SENSITIVITY

<table>
<thead>
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</thead>
<tbody>
<tr>
<td>[A]</td>
<td>HIGH</td>
<td></td>
</tr>
<tr>
<td>[B]</td>
<td>MEDIUM</td>
<td></td>
</tr>
<tr>
<td>[C]</td>
<td>LOW</td>
<td></td>
</tr>
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</table>

### G IMPACT MITIGATION

- Impact Identified
- Mitigation options

### H DETERMINATION OF ENVIRONMENTAL CATEGORY BASED ON SCREENING

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<tr>
<td>[A]</td>
<td>REQUIRES ARAP/ RAP</td>
<td></td>
</tr>
<tr>
<td>[B]</td>
<td>REQUIRES PREPARATION OF ADDITIONAL E&amp;S INFORMATION TO SUPPORT RPF</td>
<td></td>
</tr>
<tr>
<td>[C]</td>
<td>DOES NOT REQUIRE FURTHER ENVIRONMENTAL AND SOCIAL DUE DILIGENCE – REFER TO RPF</td>
<td></td>
</tr>
</tbody>
</table>

---

**PREPARED BY:**

**DATE:**

---

**Final Report – RPF for the EDP**

**September 2019**
Annex 2: Terms of Reference for preparation of ARAP and RAP
(Reference: OP 4.12, annex A)

Resettlement Action Plan
1. Description of the sub-project and of its potential land impacts
   1.1 General description of the project and identification of the project area
   1.2 Potential impacts. Identification of
      1.2.1 Project component or activities that give rise to resettlement;
      1.2.2 Zone of impact of such component or activities;
      1.2.3 Alternatives considered to avoid or minimize resettlement; and
      1.2.4 Mechanisms established to minimize resettlement, to the extent possible, during
      project implementation.
2. Objectives. The main objectives of the resettlement program
3. Socio-economic studies and census of affected assets and affected livelihoods. The
   findings of socio-economic studies and census to be conducted with the involvement of
   potentially displaced people include:
   3.1 The results of a census survey covering current occupants of the affected area to
       establish a basis for the design of the resettlement program and to exclude subsequent
       inflows of people from eligibility for compensation and resettlement assistance;
   3.2 Standard characteristics of displaced households, including a description of production
       systems, labour, and household organization; and baseline information on livelihoods
       (including, as relevant, production levels and income derived from both formal and
       informal economic activities) and standards of living (including health status) of the
       displaced population;
   3.3 The magnitude of the expected loss—total or partial—of assets, and the extent of
       displacement, physical or economic.
   3.4 Information on vulnerable groups or persons as provided for in OP 4.12, para. 8, for
       whom special provisions may have to be made;
   3.5 Provisions to update information on the displaced people’s livelihoods and standards of
       living at regular intervals so that the latest information is available at the time of their
       displacement.
3.6 Other studies describing the following
   3.6.1 Land tenure and transfer systems, including an inventory of common property
       natural resources from which people derive their livelihoods and sustenance, non-
       title-based usufruct systems (including fishing, grazing, or use of forest areas)
       governed by local recognized land allocation mechanisms, and any issues raised by
       different tenure systems in the project area;
   3.6.2 The patterns of social interaction in the affected communities, including social
       networks and social support systems, and how they will be affected by the project;
   3.6.3 Public infrastructure and social services that will be affected; and
   3.6.4 Social and cultural characteristics of displaced communities, including a description
       of formal and informal institutions (e.g., community organizations, ritual groups,
       nongovernmental organizations (NGOs)) that may be relevant to the consultation
       strategy and to designing and implementing the resettlement activities.
4. Legal and Institutional Framework.
4.1 Summary of the information included in this RPF
4.2 Local legal specificities if any
4.3 Local institutional specificities
  4.3.1 Identification of agencies locally responsible for resettlement activities and NGOs
       that may have a role in project implementation;
  4.3.2 Assessment of the institutional capacity of such agencies and NGOs; and
5. Eligibility and entitlements. Based on the definitions and categorization in this RPF (see
       entitlement matrix), definition of displaced persons and criteria for determining their
       eligibility for compensation and other resettlement assistance, including relevant cut-off
       dates.
6. Valuation of and compensation for losses. The methodology to be used in valuing losses to
       determine their replacement cost; and a description of the proposed types and levels of
       compensation under local law and such supplementary measures as are necessary to
       achieve replacement cost for lost assets.
7. Resettlement measures:
   7.1 Description of the packages of compensation and other resettlement measures that will
       assist each category of eligible displaced persons to achieve the objectives of the policy
       (see OP 4.12, para. 6).
   7.2 Site selection, site preparation, and relocation. Alternative relocation sites considered and
       explanation of those selected.
   7.3 Legal arrangements for regularizing tenure and transferring titles to resettlees.
   7.4 Housing, infrastructure, and social services.
   7.5 Environmental protection and management.
   7.6 Community participation. Involvement of resettlees and host communities
   7.7 Integration with host populations. Measures to mitigate the impact of resettlement on any
       host communities
   7.8 Specific assistance measures intended for vulnerable people, to be identified for instance
       amongst those listed in section 9 of the RPF
8. Grievance procedures. Based on the principle mechanisms described in this RPF, description
       of affordable and accessible procedures for third-party settlement of disputes
       arising from resettlement; such grievance mechanisms should take into account the
       availability of judicial recourse and community and traditional dispute settlement
       mechanisms.
9. Organizational responsibilities. The organizational framework for implementing
       resettlement, including identification of agencies responsible for delivery of resettlement
       measures and provision of services; arrangements to ensure appropriate coordination
       between agencies and jurisdictions involved in implementation; and any measures
       (including technical assistance) needed to strengthen the implementing agencies’ capacity
       to design and carry out resettlement activities; provisions for the transfer to local
       authorities or resettlees themselves of responsibility for managing facilities and services
       provided under the project and for transferring other such responsibilities from the
       resettlement implementing agencies, when appropriate.
10. Implementation schedule. Based on the template presented in the RPF, present an
    implementation schedule covering all resettlement activities from preparation through
    implementation, including target dates for the achievement of expected benefits to
    resettlees and hosts and terminating the various forms of assistance. The schedule should
indicate how the resettlement activities are linked to the implementation of the overall project.

11. Costs and budget. Tables showing itemized cost estimates for all resettlement activities (see Section 13 of this RPF), including special assistance to vulnerable persons and other contingencies.

12. Monitoring and evaluation. Arrangements for monitoring of resettlement activities by the implementing agency, supplemented by independent monitors as considered appropriate by the Bank, to ensure complete and objective information; performance monitoring indicators to measure inputs, outputs, and outcomes for resettlement activities; involvement of the displaced persons in the monitoring process; evaluation of the impact of resettlement for a reasonable period after all resettlement and related development activities have been completed; using the results of resettlement monitoring to guide subsequent implementation.

Abbreviated Resettlement Action Plan

1. Description of the Project an Sub-Projects
   1.1. Sub-Project Land Needs
   1.2. Land Needs Justification and Minimization
2. Census Survey of Displaced Persons and Valuation of Assets
   2.1. Methodology
   2.2. Results
3. Affected Assets
4. Socio-Economic Features and Affected People’s Livelihoods
5. Description of Compensation and Other Resettlement Assistance
6. Consultation with Displaced People
7. Procedures for Grievance Redress
8. Monitoring and Evaluation
9. Institutional Responsibilities and Arrangements for Implementation
10. Timetable, Budget and Funding Arrangements
### Appendix 3: Framework for the Census of Affected Assets and Affected People

**AFFECTED PLOT OR LAND FORM**

Reference/GPS Coordinates:
Location: Region: District: Community/ Village:

Surface:
Description of soil:

<table>
<thead>
<tr>
<th>Crops</th>
<th>1</th>
<th>Owner:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Perennial Crops</td>
<td>2</td>
<td>Owner:</td>
</tr>
<tr>
<td>Annual Crops</td>
<td>1</td>
<td>Owner:</td>
</tr>
<tr>
<td>Annual Crops</td>
<td>2</td>
<td>Owner:</td>
</tr>
<tr>
<td>Trees</td>
<td>1</td>
<td>Owner:</td>
</tr>
<tr>
<td>Trees</td>
<td>2</td>
<td>Owner:</td>
</tr>
</tbody>
</table>

 Structures: Owner
 Channels: Owner:
 Anti-erosive structures: Owner:
 Buildings: Owner:

 Users: User 1: Surface used: Regime of tenure:
 User 2: Surface used: Regime of tenure:
 User 3: Surface used: Regime of tenure:
 User 4: Surface used: Regime of tenure:

 Valuation proposal (details of calculation on attached sheet):
 Crops:
 Structures:

 Proposed distribution of compensation:
 User 1:
 User 2:
 User 3:
 User 4:

 Date: Prepared By:
AFFECTED BUILDING FORM

Reference/ GPS Coordinates/Photograph number
Location: Region. District. Community/Village
Owner: Address:
Description:
Permanent | Non permanent
Surface: | Number of rooms:
Walls: | Material  Condition
Roof: | Material  Condition
Floor: | Material  Condition
Annexes outside: Latrine: Bathroom: Kitchen: Others:
Additional features:
Permanently Inhabited: By: Regime of occupation:
Periodically Inhabited: By: Regime of occupation:
Valuation proposal (details of calculation on attached sheet):
Proposed distribution of compensation:
User 1:
User 2:
User 3:
User 4:
Date: Prepared By:

AFFECTED HOUSEHOLD FORM

Household Reference:
Location: Region: District: Village:
Photograph numbers for each household member
Reference of Affected Asset:
Type: Structure Plot Crop
Reference of Affected Asset Sheet:
Location: Zone: Region:
Household Information:
Head of Household: Name: Age: Sex:
Identity Document: Type: Number:
Composition of Household:
Socio-Economic Information:
Occupations:
Head of Household:
Other members of Household:
Number: Occupation:
Number: Occupation:

Total Estimated Household Cash Income:
Education level of Household Members:

Project Impact:
Assessment of the Impact of the Loss of the Affected Asset on Household’s Livelihood:

Proposed Compensation or Resettlement Package
Household’s Wishes
Proposed Package

Proposed Livelihood Restoration or Assistance Package:
Household’s Wishes
Proposed Package

Date: Prepared By:
Annex 4: Compensation Claim and Commitment Form

COMPENSATION CLAIM & COMMITMENT FORM

Affected Person Information:

Name of claimant: .............................................................. Sex: ......................... Age: ......................

Name of Representative/Contact Person: ...........................................................

Region: .............................. Town: .............................. Community/Suburb: ..............................

Affected property: ..............................................................................................

Total Compensation Due:

<table>
<thead>
<tr>
<th>Affected property value (GHS)</th>
<th>Disturbance (GHS)</th>
<th>Livelihood assistance (GHS)</th>
<th>Other supplementary assistance as necessary (GHS)</th>
<th>Total compensation (GHS)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

Compensation Payment Commitment:

I, .........................................................., having received the above total compensation amount for the land required/structures/crop(s) at the project site in question on .............................................................(i.e. date of compensation payment), have agreed in principle to vacate or release the said land(s), for which compensation has been paid for the crops/structures/land thereon, on .............................................................(agreed date when PAP should vacate or release the land).

Signature or Thumb print of claimant /recipient: ..................................................... Date: ....................

Name of Administrator (MAFFS/Project Representative):

..............................................................................................................................

Signature of Administrator: ............................................................. Date: .............................................

Contact of Administrator: ..............................................................

Name of Witness: ............................................................. Signature of Witness .............................................

Contact of Witness: ..............................................................
Annex 5: Model Complaint Registration and Resolution Form

-MODEL COMPLAINT REGISTRATION & RESOLUTION FORM-

Name (Complainant): ………………………………………………………………………………………………………………………………………

ID Number (PAPs ID number if any): …………………………………………………………………………………………………………………

Contact Information (house number/ mobile phone): …………………………………………………………………………………………………

Nature of Grievance or Complaint: …………………………………………………………………………………………………………………………

Details of Grievance: ……………………………………………………………………………………………………………………………………………

………………………………………………………………………………………………………………………………………………………………………………

………………………………………………………………………………………………………………………………………………………………………………

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………………………………………………………………………………………………………………………………………………………………………………

Name (Receiver): ……………………………………………………… Signature: ……………………..

Date: ………………………

Name (Filer): ……………………………………………………… Signature: ……………………..

Date: ………………………

Relationship to Complainant (if different from Complainant):

Review/Resolution Level 1 (District) ☐ Level 2 (Ministry) ☐ Level 3 (Court) ☐

Date of Conciliation Session: …………………………………………………………………………………………………………………………………

Was Filer/Complainant Present?: Yes No

Was field verification of complaint conducted? Yes No

Findings of field investigation: ……………………………………………………………………………………………………………………………

………………………………………………………………………………………………………………………………………………………………………………

Summary of Conciliation Session Discussion: ……………………………………………………………………………………………………………

Issues: …………………………………………………………………………………………………………………………………………………………………

………………………………………………………………………………………………………………………………………………………………………………

Was agreement reached on the issues? Yes No

If agreement was reached, detail the agreement: …………………………………………………………………………………………………

………………………………………………………………………………………………………………………………………………………………………………
If agreement was not reached, specify the points of disagreement:

……………………………………………………………………………………………………………………………………

……………………………………………………………………………………………………………………………………

Signed (Conciliator): ...........................................  Signed (Filer/Complainant): ...........................................

Signed: ...................................................................
(Independent Observer e.g. Ward Committee representative/Opinion Leader)

Date: ........................................................................

**Implementation of Agreement**

Date of implementation:

……………………………………………………………………………………………………………………………………

Feedback from Filer/Complainant:  Satisfied □  Not Satisfied □

If satisfied, sign off & date: ...........................................................

……………………………………………………………………………………………………………………………………

(Filer/Complainant)  (Conciliator)

If not satisfied, recommendation/way forward: .................................................................

……………………………………………………………………………………………………………………………………

……………………………………………………………………………………………………………………………………

……………………………………………………………………………………………………………………………………

……………………………………………………………………………………………………………………………………

(Signature & date of Filer/Complainant)  (Signature & date of Conciliator)
Annex 6: Stakeholder consultations

List and contacts of stakeholders consulted from 28th to 31st May 2019

<table>
<thead>
<tr>
<th>No</th>
<th>Name</th>
<th>Organization</th>
<th>Position</th>
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<tbody>
<tr>
<td>1</td>
<td>Alimamy Bangura</td>
<td>Ministry of Finance, Economic Policy and Research Unit</td>
<td>Director</td>
</tr>
<tr>
<td>2</td>
<td>Sharka Sannah</td>
<td>SME Development Agency (SMEDA)</td>
<td>Director</td>
</tr>
<tr>
<td>3</td>
<td>Morris Marah</td>
<td>Sensi Tech Hub</td>
<td>General Manager</td>
</tr>
<tr>
<td>4</td>
<td>Daniel Kettor</td>
<td>Rainbo Initiative</td>
<td>Executive Director</td>
</tr>
<tr>
<td></td>
<td>Gibril Kargo</td>
<td></td>
<td>Deputy Executive Director</td>
</tr>
<tr>
<td>5</td>
<td>Gloria Mahama</td>
<td>World Bank- Sierra Leone</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Alari Mahali</td>
<td></td>
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List and contacts of stakeholders consulted from 14th to 17th May 2018

<table>
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<th>Position</th>
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<tbody>
<tr>
<td>1</td>
<td>Abu Bakarr Jalloh</td>
<td>Ministry of Works, Housing and Infrastructure</td>
<td>Director of Housing</td>
</tr>
<tr>
<td>2</td>
<td>Alphasor Bah</td>
<td>Ministry of Works, Housing and Infrastructure</td>
<td>Senior Quantity Surveyor Assistant</td>
</tr>
<tr>
<td>3</td>
<td>Ajah Fillie-Faboe</td>
<td>Ministry of Works, Housing and Infrastructure</td>
<td>Chief Building Inspector</td>
</tr>
<tr>
<td>4</td>
<td>Tamba P. Ngegba</td>
<td>Ministry of Works, Housing and Infrastructure</td>
<td>Senior Building Inspector</td>
</tr>
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Members of project preparation committee present

<table>
<thead>
<tr>
<th>No</th>
<th>Name</th>
<th>Organization/ Community</th>
<th>Position</th>
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<tbody>
<tr>
<td>5</td>
<td>Aram Kazandjar</td>
<td>Tacugama Chimpanzee Sanctuary</td>
<td>Manager</td>
</tr>
<tr>
<td>6</td>
<td>Abdul S. Sanusi</td>
<td>Ministry of Transport and Aviation</td>
<td>Planning Officer</td>
</tr>
<tr>
<td>7</td>
<td>Fatmata Abe-Osagin</td>
<td>National Tourist Board</td>
<td>Deputy General Manager</td>
</tr>
<tr>
<td>8</td>
<td>Mohamed Jalloh</td>
<td>Ministry of Tourism and Cultural Affairs</td>
<td>Director of Tourism</td>
</tr>
<tr>
<td>9</td>
<td>Umaru Woody</td>
<td>National Tourist Board</td>
<td>Planning and Development Manager</td>
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National Tourist Board

<table>
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<tr>
<td>10</td>
<td>Yassin Kargbo</td>
<td>National Tourist Board</td>
<td>General Manager</td>
</tr>
</tbody>
</table>

River No 2 community

<table>
<thead>
<tr>
<th>No</th>
<th>Name</th>
<th>Organization</th>
<th>Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Daniel Macauley</td>
<td>No. 2 River Development Association</td>
<td>Secretary General</td>
</tr>
<tr>
<td>12</td>
<td>Victor Harding</td>
<td>No. 2 River Development Association</td>
<td>Chairman</td>
</tr>
<tr>
<td>13</td>
<td>Yusufu O. Dumbuya</td>
<td>No. 2 River Development Association</td>
<td>Bar Man</td>
</tr>
<tr>
<td>No</td>
<td>Name</td>
<td>Organization/ Community</td>
<td>Position</td>
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<tr>
<td></td>
<td></td>
<td>Association</td>
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</tr>
<tr>
<td>14</td>
<td>Theophilus Mansuray</td>
<td>No. 2 River Development Association</td>
<td>Elders</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Levuma Beach community</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Alhaji M. Bangura</td>
<td>Pottor Levuma Beach Organization</td>
<td>Member</td>
</tr>
<tr>
<td>16</td>
<td>Jane Turay</td>
<td>Pottor Levuma Beach Organization</td>
<td>Chair Lady Ward Committee</td>
</tr>
<tr>
<td>17</td>
<td>Santigie Kargbo</td>
<td>Pottor Levuma Beach Organization</td>
<td>Organizing Secretary</td>
</tr>
<tr>
<td>18</td>
<td>Soltigu Nwany</td>
<td>Pottor Levuma Beach Organization</td>
<td>Member</td>
</tr>
<tr>
<td>19</td>
<td>Osman Conteh Niah</td>
<td>Pottor Levuma Beach Organization</td>
<td>Chairman</td>
</tr>
<tr>
<td>20</td>
<td>Daniel Washington</td>
<td>Pottor Levuma Beach Organization</td>
<td>Financial Secretary</td>
</tr>
<tr>
<td>21</td>
<td>Mohamed Kpaka</td>
<td>Pottor Levuma Beach Organization</td>
<td>Secretary General</td>
</tr>
<tr>
<td>22</td>
<td>Amil Kamara</td>
<td>Pottor Levuma Beach Organization</td>
<td>Program Coordinator</td>
</tr>
<tr>
<td>23</td>
<td>Sania Johnson</td>
<td>Pottor Levuma Beach Organization</td>
<td>Member</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tacugama Chimpanzee Sanctuary</td>
<td></td>
</tr>
<tr>
<td>24</td>
<td>Aram Kazandjar</td>
<td>Tacugama Chimpanzee Sanctuary</td>
<td>Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Lakka Beach community</td>
<td></td>
</tr>
<tr>
<td>25</td>
<td>Tommy Douglas</td>
<td>Lakka Community</td>
<td>Land/Business Owner</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Banana Island community</td>
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<tr>
<td>26</td>
<td>Eric Thompson</td>
<td>Banana Island</td>
<td>Deputy Head Man</td>
</tr>
<tr>
<td>27</td>
<td>Roland Cole</td>
<td>Banana Island</td>
<td>Community Member</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bureh Beach community</td>
<td></td>
</tr>
<tr>
<td>28</td>
<td>Abu Douglas Diaby</td>
<td>Bureh Beach Surf Club</td>
<td>General Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>York Village</td>
<td></td>
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<tr>
<td>29</td>
<td>Julrick Pratt</td>
<td>York</td>
<td>Headman</td>
</tr>
</tbody>
</table>
### Stakeholder consultations from 28th to 31st May 2019

<table>
<thead>
<tr>
<th>No</th>
<th>Organization comments/ concerns and suggestions</th>
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</thead>
</table>
| 1. | **Ministry of Finance, Economic Policy and Research Unit**  
Persons in attendance: Alimany Bangura (Director),  
Date: 29 May 2019  
Venue: Ministry of Finance, Freetown  
Highlights of discussion included the following:  
• This is the coordinating center of the project and will play lead role after the request to expand the scope of the earlier project was discussed and agreed with the World Bank  
• An additional US$20M has been requested to cater for the expanded scope  
• SMEs are recognized as backbone of any economy and the support is required to grow these enterprises which for this project will exclude mining related activities  
• The Solution center will be located foremost in Freetown and the second to be in one of the other Provincial areas which has not been selected yet. Appropriate and transparent criteria will be used to select the location of this second Center.  
• The infrastructure development will mainly encompass rehabilitation of buildings or construction of new ones  
• The project will among others pay attention to Gender issues. To the extent that it should consider provision of day care centers at Solution/ Incubation centers to encourage nursing mothers to be part of the program.  
• The roles of other implementing partners are acknowledged including the DSTI, SMEDA, NTB and their parent ministries. The organogram for the project is clear on institutional roles and responsibilities and also aide memoire prepared by the WB after previous visit  
• Civil society groups and the private sector all identified as important stakeholders  
• The ministry is fully committed to the project and will ensure adequate time and attention paid to have a successful project. |
| 2. | **SME Development Agency**  
Persons in attendance: Sharka Sannah (Director), Julius Kande- Kanu (Administrative Officer, Outreach & Public Education), Kalilu Kudi (Administrative Officer, Programmes), James Karrow-Kamara (Finance Officer), Eileen West (Secretary)  
Date: 29 May 2019  
Venue: SMEDA  
• SMEDA was set up by an Act of Parliament in 2016. Hence, Agency is quite new as it began operations recently in 2017  
• Main objective is to provide enabling environment for SMEs to thrive in the country. Functions include coordinating all SME activities in the country by setting up database, capacity building, facilitating access to market, etc  
• Staffing include 5 permanent staff and 6 volunteers  
• Current institutional interest in environmental and social sustainability matters exemplified in participation in Climate Change issues spearheaded by Meteorological... |
Services under Ministry of Transport and Aviation. SMEDA represented by CEO. However, there is no formal procedure in place to ensure incorporation and implementation of safeguard in activities.

- There is a database of about 7,000 SMEs but these are currently being screened to confirm status as active or dormant.
- Some SMEs encountered include agribusinesses (poultry, farming), charcoal making, IT sector etc. Traders bringing in items from neighbouring Guinea are recognized as the largest group within the informal sector.
- Programs aligned with state policies which has targeted empowerment of youth and women, About 60% of effort skewed towards gender.
- Aware of various Innovation Hub centers in the country. Has written formally to these seeking cooperation
- Other partners include SLECAD, National Commission of Social Action etc
- Key challenges include lack of funding from central government, resource constraints (no vehicles, equipment, training facilities lacks furnishing,

3. **SENSI TECH HUB**

Persons in attendance: Morris Marrah (General manager), Mark Charmer

Date: 30 May 2019

Venue: Sensi Tech Hub offices, Aberdeen, Freetown

- Has participated in some EDP preparatory meetings
- Strong advocate on the need to fully engage the private sector especially for the design and activities of the Innovation Hubs
- Sensi Hub since establishment in 2006 has supported young entrepreneurs giving them training and facilitating access to capital. It has 4 centers across the country and expects to be scaling up
- Has received support from donor community including GIZ, CRS etc whom they also offer their services.
- Competitors are few and may include Innovation Axis, Grow SL and some other youth groups with some support from the British Council

4. **RAINBO INITIATIVE**

Persons in attendance: Daniel Kettor (Executive Director), Gibril Kargo (Deputy Executive Director)

Date: 30 May 2019

Venue: Rainbo Initiative Offices, Aberdeen, Freetown

- NGO operating nationwide and with key interest and expertise in GBV
- Interest stems from atrocities committed during civil war and therefore Abuse centers built after the war to provide support to survivors such as counselling and medical
- Currently operating through three centers in Freetown, Kono and Kenema. Other centers coming up in Bo and Makeni and these are located in government hospitals. The Centers are staffed with midwives, counselors, para-legal persons and doctors.
- Current data suggests about 10 to 15 rape cases committed daily country-wide
- Activities include Counselling, Outreach programs in communities, schools, mosques, churches, Advocacy, Data gathering and management for GoSi and donor
community

• Has 37 full time staff with about 20 interns (volunteers)
• Donor support from Irish Aid, UNFPA etc
• Sole institution providing credible data on GBV cases to GoSL and donor community. Recent government policy directives have been influenced by information provided by Rainbo Initiative
• Conversant with WB policies and expecting to sign MOU with the Bank for another project soon.

WORLD BANK OFFICE - SIERRA LEONE
Persons in attendance: Gloria Mahama, Alari Mahali
Date: 29 May 2019
Venue: World Bank offices - Freetown

• Updated report to be processed under the old PS hence new WB EMF format not required
• Concerns about GBV at tourist sites to be addressed in the updated report
• To include child labour/ trafficking and labour management issues
• Documents available to facilitate reporting include Good Practice Notes and Action Plans on GBV
• NGOs may be engaged to implement GBV mitigation plans which will include offering health, psychological and legal support and shelters for survivors (not victims)
• There is a pending arrangement in the form of an MOU to use the services of the NGO, Rainbo Initiative under the WB funded Urban Transport Project
• Even though girls and women are vulnerable in the tourism industry likewise women entrepreneurs may be exposed to harassment when power dynamics are at play
• The SME incubation concept may entail offering training, coaching, technical assistance for existing enterprises or start- ups or even at the ideas stage
• There are some good examples of local Incubation hubs such as Sensi Tech and Innovation SL. SMEDA is a government agency supporting SMEs even though their current capacity is low and will require technical support
• The project should be concerned with environmental and social management issues to be presented by start- up companies when they are established. For example, use of plastics to mold construction blocks
• Labour management issues to be mentioned in terms of procedures for engagement, grievance redress, discrimination, child labour etc
• Project should explore opportunities for digitization especially for the GRM

Stakeholder consultations from 14th to 17th May 2018

<table>
<thead>
<tr>
<th>No</th>
<th>Organization/ Community/ Comments, Concerns and Suggestions</th>
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<tbody>
<tr>
<td>1</td>
<td>Members of the SLSTD Project Preparation Committee</td>
</tr>
<tr>
<td></td>
<td>Persons in attendance: Mohamed Jalloh (Director of Tourism, Ministry of Tourism), Fatmata Abe-Osajin (Deputy General Manager), Abdul S. Sanusi (Ministry of Transport and Aviation), Aram Kazandjor (Manager, Tacogama Sanctuary) and Mr. Umaru Woody (Planning and Development Manager).</td>
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<tr>
<td>No</td>
<td>Organization/ Community/ Comments, Concerns and Suggestions</td>
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<tr>
<td></td>
<td>Date: 14 May 2018</td>
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<tr>
<td></td>
<td>Venue: Tourist Board offices</td>
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<td></td>
<td><strong>Highlights of the discussion included the following:</strong></td>
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<td></td>
<td>• No decision has been taken on the specific sites to benefit from the project</td>
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<td>• Tourism has been highlighted by the new government as a key economic development sector and opportunities must be fully exploited</td>
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<td></td>
<td>• Potential sites include beaches, such as Lakka, Kent, River no. 2; York Village (an old historical town with colonial buildings, caves etc); Banana Island (slave transport); Tecugama game reserve (Chimpanzee sanctuary) etc,</td>
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<tr>
<td></td>
<td>• Facilities to be provided may include jetty at Kent to assist boat transport to Banana Island, construction of new facilities at beaches (sanitation, restaurants, reception etc), access roads etc</td>
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<td></td>
<td>• The proposed interventions will not relocate any persons or businesses</td>
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<td>• Beach areas are state property as per the Foreshore Act. This stretches up to 150m onshore.</td>
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<td>• It is appreciated that communities are providing services and operating various businesses at the sites to earn income. The project will seek to add value to the current community effort to make the sites more attractive for both local and international tourists.</td>
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<td>• A more structured relationship will be created with the Ministry to ensure that standards are satisfactory.</td>
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<td>• There are rivalries between youth and other groups within communities and the tourist board may mediate to forge unity. Most facilities are currently managed by the Youth groups with some support from the local Head persons.</td>
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<td></td>
<td>• The Board will encourage these groups to formalize their relationships and acquire legally binding documents on land and other properties they may have acquired</td>
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<td>• There is a strategic tourism development plan (2009-2015) requiring updating</td>
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<td>• The Tourist Board currently promotes community involvement in tourism but as the industry expands, more serious direct investment will be required which may be beyond the capacity of the communities. Partnerships may be required with foreign/local investors.</td>
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<td>• The communities may be sensitized to be ready for such interventions and be made to understand that they stand to gain more when in partnerships than alone. However, any such partnership arrangements should be very well negotiated and documented to avoid litigations later</td>
</tr>
<tr>
<td></td>
<td>• The Monuments and Relics Commission is responsible for national edifices and any such buildings</td>
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<tr>
<td></td>
<td>• The National Protected Areas Authority manages about 5 or 6 main protection areas in the country including the Tecguma sanctuary for chimpanzees but which is under MAFFS. There is very little financial support from the Ministry.</td>
</tr>
<tr>
<td>No</td>
<td>Organization/ Community/ Comments, Concerns and Suggestions</td>
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<tr>
<td></td>
<td><strong>Ministry of Works, Housing and Infrastructure</strong></td>
</tr>
<tr>
<td>2</td>
<td>Persons Consulted: Abu Bakarr Jalloh (Director of housing), Alphasor Bah (Senior Quantity Surveyor Assistant), Ajah Fillie- Faboe (Chief Building Inspector), Tamba P. Ngegba (Senior Building Inspector).</td>
</tr>
<tr>
<td></td>
<td>Date: 14 May 2018</td>
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<tr>
<td></td>
<td>Venue: Housing Department offices</td>
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<tr>
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<td>• There has been a recent ministry rearrangement with the advent of the new government to create: (1) Ministry of Lands, Housing and Environment (MLHE) and (2) Ministry of Works and Public Assets (MWPA).</td>
</tr>
<tr>
<td></td>
<td>• The Housing and Survey Departments were two critical divisions under the erstwhile Ministry of Works, Housing and Infrastructure. The Housing Department has now been transferred to MLHE while the Survey Department remains with the MWPA.</td>
</tr>
<tr>
<td></td>
<td>• The Housing Department by their mandate, provides valuation services in respect of land for the government while the Survey Department provides similar services for structures (buildings). There is also consideration for compensation for livelihood losses and disturbance.</td>
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<td>• Assistance may be sought from consultants when required.</td>
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<td></td>
<td>• There is no professional certification program in Sierra Leone for quantity surveyors and they are usually affiliated to the engineering body.</td>
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<td>• There are currently no standard national rates and values are generated from basics using appropriate and recognized methods.</td>
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<td>• There is a redress mechanism in place which involves recourse to the Legal Aid Board for those requiring legal assistance.</td>
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<td>• The erstwhile Ministry of Works, Housing and Infrastructure was responsible for granting building permits throughout the country.</td>
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<td>No</td>
<td>Organization/ Community/ Comments, Concerns and Suggestions</td>
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</tr>
<tr>
<td>3</td>
<td>National Tourist Board</td>
</tr>
<tr>
<td></td>
<td>Person Consulted Mr. Yassin Kargbo (General Manager)</td>
</tr>
<tr>
<td></td>
<td>Date: 15 May 2018</td>
</tr>
<tr>
<td></td>
<td>Venue: Tourist Board offices</td>
</tr>
<tr>
<td></td>
<td>• The Board is responsible for marketing and promotion of tourism and provides classification (licensing and certification) as well as quality control</td>
</tr>
<tr>
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<td>• The Board is eager to expose international visitors to tourist attractions immediately on arrival at the airport and is working with stakeholders to display these attractions at vantage places for maximum impact. This includes video shows during sea crossings from Lungi to Freetown</td>
</tr>
<tr>
<td></td>
<td>• The Board is working with various NGOs (such as Assets?) to support community management of tourist sites especially the beaches.</td>
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<td></td>
<td>• There is also collaboration with the National Protected Area Authority (NPAA) for eco- tourism projects in forest and game reserves</td>
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<tr>
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<td>• Challenges include accessibility to sites, sanitation and security and the quality of facilities at these sites.</td>
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<td>• Communities must be trained to be professional and to operate facilities using appropriate business models to ensure sustainability</td>
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<td></td>
<td>• Communities are usually suspicious about the intention of investors and not very excited about partnerships. They will require sensitization and training programmes to be more receptive to such opportunities.</td>
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<tr>
<td></td>
<td>• Key challenges at tourist sites include sanitation, encroachment and illegal structures scattered along beaches as well as access roads</td>
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<td></td>
<td>• The Board plans to involve all stakeholders to develop the sector especially hoteliers to construct facilities at tourist areas and offer reasonable packages to both local and international visitors.</td>
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<tr>
<td>No</td>
<td>Organization/ Community/ Comments, Concerns and Suggestions</td>
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<tr>
<td>4</td>
<td>Tacugama Chimpanzee Sanctuary</td>
</tr>
<tr>
<td></td>
<td>Person Consulted - Aram Kazandjar, Manager</td>
</tr>
<tr>
<td></td>
<td>Date: 15 May 2018</td>
</tr>
<tr>
<td></td>
<td>Venue: Tacugama</td>
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</tbody>
</table>

- The Sanctuary is an autonomous institution founded in 1995 and currently under the Wildlife department of the Forestry Ministry.
- Does not receive any funding from the government to operate the facility. Relies on corporate sponsorship and the donor community. Proud of the 100% renewal rate with sponsors.
- Sanctuary has 32 local staff (maintenance, cooks, drivers, tour guides, rangers); and 4 permanent international staff (founder/director, manager, vet, conservation).
- Recovers captured baby chimps from homes where they are usually kept as pets. These are then treated and released into the wild after going through quarantine and acclimatization processes.
- Activities at the Sanctuary handicapped by many challenges in addition to funding. These include power supply, cost of feeding chimps, vehicles not dependable etc. Illegal logging is rampant in the reserve.
- Current facilities include six eco-lodges for about 18 persons at a time at about US$90 per night. There is need to diversify products to include bird watching, hiking, massages, yoga etc.
- There is limited research facilities on site and would require provision of an educational resource centre to have at least 50 seats, library etc. to attract researchers, volunteers.
- Power supply could be augmented by solar system during the dry hot months and harnessing of local stream for hydropower generation during the wet rainy months.
- Good relationship with surrounding communities including with the head men/women. Supports communities to organise football games and clean up exercises.
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<th>Organization/ Community/ Comments, Concerns and Suggestions</th>
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<tbody>
<tr>
<td></td>
<td>• Has an MOU with about 14 communities to visit sanctuary and observe activities. Five chiefs spent some time in the sanctuary recently.</td>
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<td>No</td>
<td>Organization/ Community/ Comments, Concerns and Suggestions</td>
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<tr>
<td>5</td>
<td>Charlotte Community/ Local community close to Tecugama Sanctuary</td>
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<tr>
<td></td>
<td>Person Consulted Catherine Harding, Head woman and Akibola Taylor Hakun Farmer/works as porter for Charlotte community clinic.</td>
</tr>
<tr>
<td></td>
<td>Date: 15 May 2018</td>
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<td>Venue: Charlotte village</td>
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- This is one of the communities surrounding the Tecugama sanctuary. It was established in 1818 and currently has about 300 residents.
- Water supply is mainly from the stream and there is one borehole.
- There is no electricity even though the community is close to a mini hydropower dam.
- There is a primary school in the community but after their primary education, the children have to go to the next community (Regent) to further their education.
- There is no public toilet. The school, hospital and some individuals have toilet facilities.
- The main occupation of the people of Charlotte community is farming but some people are into livestock (pig/goat) and others do stone mining (people from Freetown come to buy).
- Prior to the formation of the Tacugama Chimpanzee Sanctuary, some of the community members used to hunt, others used to go there for fuel wood/ wood cutting and finally farming.
- The Head woman was emphatic that there is very little contact with the managers of the Sanctuary and therefore enjoying no benefits from the facility
- The community was supplying mangoes to the Tacugama Sanctuary but had to stop because they were not paying.
- The community is unhappy because a resource centre to be sited in their community was relocated to Tecugama.
- They do not have any land ownership issues with Tecugama
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<th>No</th>
<th>Organization/ Community/ Comments, Concerns and Suggestions</th>
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<tbody>
<tr>
<td>6</td>
<td><strong>Lakka Beach</strong></td>
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<tr>
<td></td>
<td>Person Consulted Tommy Douglas, Land/Business Owner.</td>
</tr>
<tr>
<td></td>
<td>Date: 16 May 2018</td>
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<tr>
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<td>Venue: Lakka beach</td>
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- Sand winning within the Peninsular is a big threat to the beaches
- Generally, aware that the beach statutorily belongs to the state. Onshore beyond the beach, land belongs to the Lakka people and managed/ administered through the Headman.
- Numerous eating places dotted along the beach including the island which are owned by both locals and foreigners.
- Most of the developments are individually owned and therefore no community managed facilities are found on the beach
- Currently, the community is not very united and this is hampering growth and development of Lakka. The headman will need to address these issues to build his community
- Land has been handed down from generation to another and documentation is poor.
- Some families have sold land to foreigners for development/ investment
- Most of the visitors to the beach are locals with few foreigners
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<tbody>
<tr>
<td>7</td>
<td><strong>River No. 2 Beach</strong></td>
</tr>
<tr>
<td></td>
<td>Persons Consulted: Daniel Macauley, Victor Harding, Yusufu O. Dumbuya, Theophilus Mansuray</td>
</tr>
<tr>
<td></td>
<td>Date: 16 May 2018</td>
</tr>
<tr>
<td></td>
<td>Venue: River no. 2 Beach</td>
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<tr>
<td></td>
<td>- River No 2 is a community of about 1,000 inhabitants. Basic amenities include gravity system for water supply, power supply from generating set, basic sanitation facilities etc. There is no local school however.</td>
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<td></td>
<td>- The Youth Development Association was founded in 1996 with primary aim of developing the beach to attract tourists and earn income for themselves and the community. Most community members are also fishermen</td>
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<td>- The Association has adopted the slogan Sankofa meaning it is always wise to learn from the past</td>
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<td>- There is a constitution drawn to guide their activities and executives are elected. Currently, there are 40 members including 7 women. To qualify for membership, you have to be a member of the community and pay registration and monthly membership dues. It is being run like a welfare society with benefits such as support for medical expenses, marriage, bereavement etc</td>
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<td>- Tourists pay Le5,000 per visit which is split in 3 ways. Le3,000 to the association; Le1,000 to management; and Le1,000 to the community</td>
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<tr>
<td></td>
<td>- Management comprises the executives, and managers responsible for guest house, bar, kitchen, restaurant, purchasing, security and maintenance</td>
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### Organization/ Community/ Comments, Concerns and Suggestions

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<tr>
<th>No</th>
<th>Levuma Beach</th>
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<tr>
<td>8</td>
<td>Persons Consulted Alhaji M. Bangura, Jane Turay, Santigie Kargbo, Soltigu Nwany, Osman Conteh Niah, Daniel Washington, Mohamed Kpaka, Amil Kamara, Sania Johnson.</td>
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<tr>
<td></td>
<td>Date: 16 May 2018</td>
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<td>Venue: Levuma beach</td>
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- Currently own 12 room guest house, power generating set, restaurant etc. There is need to improve accommodation, and acquire kitchen appliances and other facilities; and are planning to construct conference hall and provide excursions to Banana island, forest hikes etc. They however require professional training
- They have had limited support from the Tourist Board in marketing and training
- There has been external support from Norwegian Refugee Council for power supply
- The community is in full support of the project which at peak times may involve 50 to 60 community volunteers
- The police assists with security during busy days
- Planning towards legal registration of facilities including land to forestall any future ownership problems

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- This is perceived as a community beach to be run efficiently to the benefit of the residents and all visitors
- Procedures for acquisition of land for development have not been properly streamlined between community and the Tourist Board. The communities do not own the beaches but are major stakeholders in managing the sites and therefore do exert some influence.
- There is a community management association duly constituted with the support of the community elders.
- Lately, rival groups have emerged and there is ongoing effort to reconcile differences and forge ahead with the development of the beaches and ultimately the town. These groups include Levuma Network for Peace and Development, Portoo Levuma Beach Association; and Portoo Levuma Beach Base Organization.
9. **Banana Island**

Persons Consulted: Eric Thompson (Deputy Head man), Roland Cole (Community member).

Date: 17 May 2018

Venue: Banana Island

- The Dublin island is one of the four Banana islands with about 250 inhabitants and it is accessed by boat ride usually from Kent.
- It used to be the transit point for slaves on their journey away from the continent and later as home for the returned slaves.
- Some tourist attractions include the remnants of slave fort and cannons for defense of the slave masters' merchandise. There are old water points, church buildings, etc.
- On their return to Africa, the slaves were shipped to the island and each family was allocated 2 town plots for settlement and some more land for farming. Land has since been handed down from generation to generation.
- Currently, the inhabitants are mostly farmers and fishermen. The youth seem idle with little interest in these occupations.
- Interest in tourism began about 10 years ago with the construction of some guest facilities. The guest house is currently abandoned because of a misunderstanding between the investor and the community members over profit sharing.
- Current social amenities on the island include: a primary school, clinic with 2 medical staff (nurses), 3 wells (the first well was dug in 1802 and still functional), household pit latrines, a church (church of England), etc.
- The island has not been zoned for development and there is fear that development may become haphazard and wasteful for the land resources available.
- Unfortunately, land has not been surveyed in recent times to confirm land sizes and to aid development planning.
- There are local taboos such as no fishing and other economic activities on Sundays. There is an unwritten rule for community members to attend church and be nicely dressed during the day.
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<th>No</th>
<th>Organization/ Community/ Comments, Concerns and Suggestions</th>
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</table>
| 10 | **Bureh Beach**  
Person Consulted Abu Douglas Diaby, General Manager  
Date: 17 May 2018  
Venue: Bureh town  
- The Bureh Beach Surf Club is the major group managing the beach to attract tourists  
- This is a youth group recognized by the town with current membership of about 13 persons including one female surfer.  
- The group has a formal arrangement with the town which includes documentation to confirm ownership of land and facilities  
- They were assisted by an NGO, Welthungerhilfe (WHH) with a kitchen, 5 surfing boards. They have used their resources to provide accommodation of about six rooms for guests. Some support from individuals and groups after their visits  
- Initially arrangement was to give 50% of revenue to workers, 25% to maintain equipment and the final 25% to the community. However, due to low revenue, payment to the community has been suspended.  
- The Club members usually meet on Mondays to plan and take decisions on their operations  
- The Club is run by a constitution with some bye- laws. Elections for executive positions are held annually.  
- Currently working on opening a bank account for better financial management  
- Would welcome investors but will maintain majority ownership and involvement in the management of facilities |
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<tbody>
<tr>
<td>11</td>
<td>York Town</td>
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<tr>
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<td>Person Consulted Julrick Pratt, Headman</td>
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<td>Date: 17 May 2018</td>
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<td>Venue: York town</td>
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- York is a well established and nicely planned old town celebrating its centenary this year.
- Current population is in the region of about 1,200 persons
- The unique black sand beach is community managed. There is also an island close to the beach, which is uninhabited but may contain some interesting wildlife including flora.
- There are no land ownership challenges
- The main occupation of the community is fishing and the women are usually fishmongers. The youth are responsible for keeping the beaches clean and periodic planting of trees for shade
- Power supply is from generating sets and water is by gravity system from a dam
- There are several monuments in York such as old accommodation used by the King of England, numerous colonial items such as church bells, lamp posts etc. Most of the monuments are deteriorating. The first secondary school in the peninsula can be found in York. There is no support from the government to maintain these monuments and relics.
- The town can also boast of a cave which is suggested to be more than 2 miles long but is currently structurally unsafe to explore.
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<tr>
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<td>Visitors include school children who come on educational tours.</td>
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