

THE GOVERNMENT OF SIERRA LEONE

STAKEHOLDER ENGAGEMENT PLAN

PROJECT: ACCOUNTABLE GOVERNANCE FOR BASIC SERVICE DELIVERY PROJECT

April 2021

ACRONYMS

Acronym	Full Meaning
CC	City council
CERC	Contingent Emergency Response Component
CO2	Carbon Dioxide
CPIT	City Project Implementation Team
CREWS	Climate Risk and Early Warning Systems
CSOs	Civil Society Organizations
DFID	UK Department for International Development
DRM	Disaster Risk Management
DSTI	Directorate of Science Technology and Innovation
EOC	Emergency Operations Center
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
EVD	Ebola Virus Disease
FCC	Freetown City Council
FDD	Fiscal Decentralization Division-Ministry of Finance
FERP	Freetown Emergency Recovery Project
FQE	Free Quality Education
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GEF	Global Environment Facility
GEF-7	7th GEF Replenishment (Financing Round)
GFDRR	Global Facility for Disaster Reduction and Recovery
GHG	Greenhouse Gas
GIS	Geographic Information System(s)
HCI	Human Capital Index
IA	Implementing Agency
IDA	International Development Association (of the World Bank Group)
IPF	Investment Project Financing
LoCASL	Local Councils Association of Sierra Leone
LC	Local Council
LGSC	Local Government Service Commission
MDAs	Ministries, Departments, and Agencies
MoF	Ministry of Finance
MTNDP	Medium Term National Development Plan
NaDMA	National Disaster Management Agency
NaMED	National Monitoring and Evaluation Directorate
NDP	National Development Plan
NGO	Non-Governmental Organization
O&M	Operations and Maintenance
ONS	Office of National Security
PAI	Project Area of Influence
PAP	Project-affected Persons
PCR	Primary Completion Rate
PDO	Project Development Objective

PIM	Project Implementation Manual
PFMRU	Public Financial Management Reform Unit
PFMU	Project Fiduciary Management Unit
PMIS	Project Management and Implementation Support
PMU	Project Management Unit
POM	Project Operations Manual
PPP	Public-Private Partnership
PPSD	Project Procurement Strategy Development
PSC	Project Steering Committee
RUSLP	Resilient Urban Sierra Leone Project
SCIP	Sustainable Cities Impact Program (GEF)
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SLIHS	Sierra Leone Integrated Household Survey
SLUDI	Sierra Leone Union on Disability Issues
SMEs	Small and Medium Enterprises
SWM	Solid Waste Management
TA	Technical Assistance
TLMs	Teaching and Learning Materials
ToR	Terms of Reference
WB	World Bank
WARDC	Western Area Rural District Council
WASH	Water, Sanitation, and Hygiene

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EXECUTIVE SUMMARY

This Stakeholder Engagement Plan (SEP) is designed to guide the processes of engagements, consultations, and disclosure of project information to all relevant stakeholders of the Accountable Governance for Basic Service Delivery Project. The Government of Sierra Leone (GoSL) through the Ministry of Finance is being considered for a financial grant from the World Bank to implement the Accountable Governance for Basic Service Delivery Project. The Project Development Objective (PDO) is to improve resource management, transparency and accountability of government systems for enabling the delivery of local development projects and basic services. The main beneficiaries of the project will be poor Sierra Leoneans who rely on publicly delivered basic services, notably the disproportionately higher numbers of citizens living in poverty outside urban areas.

The project has four (4) main components as follows:

- i. Enhancing systems and skills to deliver local services
- ii. Building the capacity of local structures to promote Local Development
- iii. Integrated data platforms for monitoring and accountability
- iv. Project Management and Implementation Support (PMIS)

The preparation of the project stakeholders was done with reference to relevant national laws and policies that promote effective stakeholder engagement and identification during project implementation. Some of these laws include: the Constitution of Sierra Leone; The Local Government Act (2004) as amended in 2017; The Environment Protection Agency Act, 2008 (as Amended in 2010); The Town and Country Planning 1976 (Amendment) Act 2001; The Local Content Act (2016); The Right to Access Information Act (2013); Sexual Offences Act, 2012, the Child Rights Act (2007), The National Policy on the Advancement of Women, National Policy on Gender Mainstreaming; and The GBV Referral Protocol.

The identification and analysis of the SEP was done by consulting with key stakeholder groups based on preliminary information contained in the Project Appraisal Documents and initial consultations already carried by the Ministry of Finance-the main proponent of this project. The stakeholders identified in the SEP have been grouped into four categories namely:

- i. Project proponents (Lead Implementing Agencies)
- ii. Affected Parties (mainly beneficiaries, PAPs etc.)
- iii. Other Interested Parties
- iv. Vulnerable Group

This SEP outlines details of the purpose, timing, and methods of engaging with each stakeholder group and strategies for information disclosure to all stakeholders especially vulnerable groups. The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within the PMU and resources for the implementation of the SEP will be sourced from the Government of Sierra Leone and also from Component 5 of the project which made

provisions to cover costs associated with overall project coordination including communication and outreach to stakeholders.

A summary of key institutions and focal persons have been identified in this SEP to allow for easy identification of roles and responsibilities. A Grievance Redress Mechanism (GRM) has also been incorporated into the SEP where project related grievances will be resolved using laid down procedures. The GRM will be accessible and understandable for all stakeholders in the project and for the entire project life. A Monitoring and evaluation framework has also been designed to monitor the implementation of SEP. Key performance indicators for each stakeholder engagement activity have been developed and outlined in the SEP.

1.0 INTRODUCTION/PROJECT DESCRIPTION

1.1 Overview

Despite the significant strides in the restoration of peace, security, and the relative stability in the transition of political from one political party to another, majority of Sierra Leone's 7.8 million people still experience low levels of human development outcomes which is due largely to inefficiencies in the local services delivery chain. Sierra Leone ranks 151 out of 157 countries in the recently launched Human Capital Index (HCI)¹ and the rate of poverty in the rural areas are more than twice as high as those in the urban areas (73.9 percent versus 34.8 percent).² Also, even though the largest poverty reduction occurred in urban areas around the capital, Freetown (by 0.9 percentage points annually over 2012-2018), inequality is still high in Sierra Leone, with the bottom 40 percent of the population having only 20 percent of the total household consumption. If poor human development outcomes continue indefinitely, they will generate avoidable human misery, impede economic development, and risk undermining citizens' already fragile trust in governing institutions.

The government of Sierra Leone in collaboration with development partners and donors have increased financing of inputs in key human development sectors such health and education. For instance, health expenditures as a percentage of the Gross Domestic Product (GDP) have increased from 9.9 per cent in 2008 to 11 per cent in 2020. Over this period, total per capita spending on health has doubled in real terms, as has government expenditure on health. Education spending as a percentage of GDP has also increased from 2.4 per cent in 2008 to 22 per cent in 2020. The share of overall public spending on education has doubled, from 14.9 per cent in 2008 to just over 33 per cent in 2018; the recent increase is a direct consequence of the Government's commitment to Free Quality Education (FQE) program. The Primary Completion Rate (PCR) has increased from 55 percent in 2004 to 81 percent in 2018 which is above the regional average (69 percent). Cost barriers to accessing health have been reduced through government policies on free health care for mothers and young children.

However, inefficiencies in the local services delivery systems are preventing better outcomes and this is a key concern for the country's Medium Term National Development Plan (MTNDP). Despite improvements in financing, Sierra Leone's HCI places the country lower than the average in Sub-Saharan Africa and lower than its income group (lower middle-income countries). Sierra Leone has some of the most inefficient health and education spending in the world in terms of turning inputs into outputs using a production-possibility frontier analysis. In other words, the value for money of basic services spending is poor, compared to other sub-Saharan African countries. Inefficient public sector delivery systems are not confined to basic services: government effectiveness indicators for the country have remained consistently among the weakest in the world, ranking 171 out of 193 countries.

It is against this background that the Government of Sierra Leone (GoSL) through the Ministry of Finance is being considered for a financial grant from the World Bank to implement the Accountable Governance for Basic Service Delivery Project. The main objective of the project is to strengthen the governments' institutional capacity, accountability, and management of resources to more effectively deliver basic services at the local level so as to respond to community needs, across all districts. The Project will support

¹ The HCI is made up of five indicators: the probability of survival to age 5, a child's expected years of schooling, harmonized test scores as a measure of quality of learning, adult survival rate (fraction of 15-year-olds that will survive to age 60, and the proportion of children who are not stunted.

² While the capital area of Freetown has the lowest poverty headcount of 23.5 percent, at least three rural districts have poverty rates of above 80 percent. The disaggregated data highlights the concentration of poor across almost all 16 rural districts being high; see World Bank (2019) Sierra Leone Poverty Assessment.

the Country Partnership Framework (CPF) stated goals under Focus Area 1 on Sustainable Growth and Accountable Governance (Improve government accountability for results in use of public finances) and Focus Area 2 on Human Capital Acceleration for Inclusive Growth (Deliver quality and inclusive education and health services). The Project focus will build on the existing support to PFM reforms and other accountability systems at the central level while expanding it to the local level.

The project's emphasis on improving local government effectiveness and citizen engagement on basic service delivery addresses a critical gap and complements other operations in the country portfolio such as the Free Basic Education Project (P167897), the Pipeline Health Project (P172102), and the Resilient Urban Sierra Leone Project (P168608). Under this project, there will be an additional focus on empowering citizens with capacity building in technical areas to enable effective budget oversight and monitoring, with a particular focus on empowering women in these roles. Furthermore, through a partnership with the Global Partnership on Social Accountability, this project will build upon an existing engagement on increasing accountability of service delivery in education and health sectors, as well as building capacity of selected parliamentary committees to improve their oversight role. This project links the wider procurement systems reforms supported by the Third Productivity and Transparency Support Grant (P169498) to the Education and Health sectors specifically.

The project will contribute to meeting commitments within IDA19's Governance and Institutions Special Theme. The project will directly support maximizing the impact of investments in service delivery (Pillar 2) through improving the efficiency of public expenditures, and more effectively aligning expenditures with domestic financing and external resources in a sustainable manner. In addition, the project will have a strong focus on the benefits that technology has to offer in selected areas in core government functions related to PFM, procurement, monitoring, and accountability systems for basic services at the local level (i.e., GovTech). While technology can be an important enabler, the project will additionally focus on accountability gaps that are often more a result of weak incentives for use of data systems and sharing of key information that result in monitoring weaknesses. The project will, consequently, also support the commitments within the IDA19 Special Theme on building confidence in institutions (Pillar 3) and improve data for evidence-based decision-making (Pillar 4).

The project aligns with the WBG COVID-19 Crisis Response framework, as it supports the social response to rural communities (Pillar 2), the economic response through using development grants for local service delivery and improved local markets (Pillar 3) and strengthening institutional systems for local governance (Pillar 4). Support to rural communities through strengthening local governments is a core part of the social response for protecting poor and vulnerable people from the impact of the economic and social crisis triggered by the pandemic. This project aims to strengthen the Local Councils in districts as conveners of community engagement. The project will also strengthen productive inclusion programs that leverage community structures, including local governance groups such as Ward Development Committees for planning the use of project-financed local development grants. It will strengthen district M&E structures as fora for monitoring development results and social accountability through increased citizen engagement. Finally, the project will strengthen institutional systems to deliver accountable basic services, as well as transparent management and oversight. Local community networks of outreach and engagement working alongside district Local Councils have been noted previously during the Ebola experience in Sierra Leone as critical to an effective community-level response during a pandemic outbreak.

The project will also imbed methods that will promote active citizen/stakeholder engagement by focusing on incentivizing increased participation and voice of women in participatory local development planning

in the rural districts of the country is a key results area for the project. The project will finance capacity building in technical areas to enable effective participatory planning processes, budget oversight and monitoring, with a particular focus on empowering women in these roles within the village community, in Ward Development Committees (WDCs) and in engagement with Local Councils. It will also support initiatives such as social audits in the local councils, participation of civil society organizations, beneficiary feedback surveys, and grievance redress mechanism. A key challenge identified in the implementation of the local level participation relates to mobilizing action to enable women's voice and agency (Pillar 4 of the WBG Gender Strategy). Furthermore, through joint work with the Global Partnership on Social Accountability, this project will build upon an existing effort to increase accountability of service delivery in education and health sectors, as well as building capacity of selected parliamentary committees to improve their oversight role.

1.2 Key National Legislations and Policies Stakeholder Engagement and Information Disclosure

The national laws, regulations, and policies that are related to stakeholder engagement and information disclosure as follows:

The Constitution of Sierra Leone

Section 3 of the Sierra Leone Constitution guarantees the fundamental human rights and freedoms of the individual without regard to his race, tribe, place of origin, political opinion, colour, creed or sex, which must be exercised in consonance with the rights and freedoms of others and for the public interest. Paragraph 25 of Section 3 which states that no person shall be hindered in the enjoyment of his freedom of expression including the freedom to hold opinions, receive and impart ideas as well as information without interference which is consistent with the provisions of ESS10 which admonishes for full disclosure of project information to all stakeholders.

The Local Government Act (2004) as amended in 2017

The Local Government Act, 2003 has a number of areas where stakeholder consultation is required. For example Section 23 makes provision for local councils to be consulted by central government ministries, departments, agencies, NGOs etc., in development projects; and Section 85 (4) notes that "A local council shall, before approving or reviewing a development plan, consult residents of the locality, agencies of Government and non-governmental and international organizations that have interest in working in the locality". It is therefore expected that the Project Management Unit in collaboration with the Local Councils will actively engage and consult project stakeholders especially those at the community level and other disadvantaged segments of the society.

The Environment Protection Agency Act, 2008 (as Amended in 2010)

The EPA Act is the legislation governing the protection of the environment in Sierra Leone. The Third Schedule (under Section 26) of the Act describes the content of Environmental Impact Assessment (EIA) and admonishes that the EIA must report on the communities, interested parties and Government ministries consulted and by extension issues consulted on. In terms of information disclosure, a requirement of ESS10, Section 27 (1) of the Environment Protection Agency Act, 2008 stipulates that the Agency upon receiving the draft EIA report shall circulate it to professional bodies, associations, ministries and governmental organizations for their comments. Under Section 27 (2) the Agency is also required to openly display the EIA report in two consecutive issues of the Gazette as well as in the newspapers to allow for public viewing. The proponent is expected to address the comments from the general public as received through the Executive Director within fourteen (14) days upon receipt of the comments.

The Town and Country Planning 1976 (Amendment) Act 2001

The Town and Country Planning Act mandates the Minister of Housing and Country Planning to consult the various Local Councils and Paramount Chiefs in the planning and management of cities and town in Sierra. The Act also requires the Minister to conduct location specific public hearings and consultations on issues related to the planning and management of the towns and cities. The Minister is also mandated by this Act to direct for the posting all relevant information such the surveyed maps, layout, the value of any building or land in the planning area which is intended to guide any compensation in case of project land take.

The Sierra Leone Local Content Agency Act, 2016

The Local Content Act is aimed at promoting growth and development of the domestic private sector by creating linkages with the large domestic and foreign firms through the utilization of local resources and products, and to promote the integration of the Sierra Leoneans in all economic activities. It also requires sectoral policies and projects to promote the utilization of locally available Sierra Leonean goods in the industrial and manufacturing sectors as well as support the growth of small and medium enterprises through targeted Government procurement and promote a culture of local ownership and participation in aspects of productive work.

The Accountable Governance project is therefore envisaged to use skilled and unskilled labor mainly from local and surrounding communities. It is also anticipated that contracting and procurement for the project will be done using local resources.

Regulation of Wages and Industrial Relations Act 1971 (No 18)

Clause 29 of the Act explicitly outlined seven step processes of redressing grievances for employees. The process commences from verbally discussing grievances with the employee's immediate supervisor to petitioning the Minister of Labour and Social Security in the event that the work-based grievance redress measures fail to resolve the grievance in question.

Sexual Offences Act, 2012

The Sexual Offences Act of 2012 criminalizes non-consensual sex between persons, including spouses. The Act increased the consensual age from 13 years, under the Prevention of Cruelty against Children Act (CAP 31) to 18 years. Section 19 of the Act introduces the concept sexual penetration, which replaces Unlawful Canal Knowledge and increases the organs involved in sexual penetration to include the mouth and anus. The Act further provides that any object used for penetration satisfies the act of sexual penetration. The Act is gender neutral, technically including sexual acts between same sexes. Marriage is not a defence for perpetrators under this Act. The confidentiality of victims (survivors) during investigation and prosecution are guaranteed under the Act. The Act also provides for medical assistance for survivors. The Act explicitly set out sanctions for offenders including jail terms.

Child Right Act, 2007

This Act sets up the National Commission for Persons with Disability with the objective to ensure the well-being of persons with disability. It grants privileges inclusive of free education up to the tertiary level as well as free medical care to persons with disability. In Section 20 and 21 of the Act, is it an offence to deny a person contracts, employment opportunities and access to education on the basis disability.

This provision meets the non-discriminatory requirement outlined in ESS10. In addition, the establishment of National Commission for Persons with Disability under this Act presents a good platform for Persons

with Disability seeking redress for work based or work -related grievances to access to meet the requirements of ESS 10.

The National Water Resources Management Agency Act, 2017

This Act to provides for the equitable, beneficial, efficient, and sustainable use and management of the country's water resources; to establish a National Water Resources Management Agency; to provide a Water Basin Management Board and Water Catchment Area Management Committees for the management of the water resources and for other related matters.

The Right to Access Information Act, 2013

Being an Act to provide for the disclosure of information held by public authorities or by persons providing services for them and to provide for other related matters. This implies that the PIU is mandated by this Act to disclose all the relevant information about the project to interested stakeholders and that failure to supply information to interested stakeholders is tantamount to an offense which is liable on conviction to a fine not exceeding ten million Leones in the case of an individual and one hundred million leones in the case of a body corporate or to a term of imprisonment not exceeding six months or to both the fine and imprisonment.

The National Policy on the Advancement of Women

The National Policy on the Advancement of Women provides conducive environment, which will allow women to improve their status and participation, to empower them and enhance their capacities as agents of change and beneficiaries of political and economic development, thus ensuring the full use of human resources for national development. It provides integrated guidelines for evaluating the activities of government department/institutions, civil society organizations, donor agencies and NGOs that are engaged in implementing Women in Development programmes. The Policy's introduction underscores the fact that because women's contribution to the national economy is acknowledged and yet is undervalued, there is a need for their full integration into the development process in order to increase their contribution for national development. It is therefore anticipated the project will take inspiration from this policy to promote the welfare of women in the design and implementation of the project.

National Policy on Gender Mainstreaming

The overall goal of the policy is to mainstream gender concerns in the national development process in order to improve the social, legal, political, economic and cultural condition of the population, particularly marginalized groups. Its aim is to provide for policy makers and other actors in the development field, reference guidelines for identifying and addressing gender concerns, particularly when taking policy decisions to redress imbalances which arise from existing inequalities; to promote access to and control over economically significant resources and benefits, or to ensure the participation of both women and men in all stages of development.

The GBV Referral Protocol

The GBV Protocol is a technical guidance document that aims to ensure that all survivors/victims of GBV (Domestic and sexual violence) receive a prompt and comprehensive response from service providers that meets their needs from the first point of contact onwards. The protocol is in response to existing commitments by the Government of Sierra Leone such as the Poverty Reduction Strategy (PRS)- Agenda for Change, the Child Rights Act 2007, and the three Gender Acts (Domestic Violence 2007, Registration of Customary Marriage and Divorce Act, 2007 and the Devolution of Estates 2007), and other related policies.

1.3 Project Components

The PDO is to strengthen the governments' institutional systems and capacity for accountability and management of resources to deliver basic services more effectively at the local level responsive to community needs of project beneficiaries. The main beneficiaries of the project will be poor Sierra Leoneans who rely on publicly-delivered basic services, notably the disproportionately higher numbers of citizens living in poverty outside urban areas.

The project is anticipated to span 5 to 6 years where structural and institutional capacity enhancement initiatives and reforms will be introduced to enhance the operations of all 16 districts while at the same time roll out the Local Development Grants scheme which will focus on introducing incentives and institutional support mechanisms to boost the performance of all 16 district councils – through the financing of conditional development/capital grants and targeted territorial coaching and training.

The PDO will be achieved through the following five components as follows:

Component 1: Systems and skills for local services (central and local levels)

This component will focus on improving the interaction between key systems at central and local level to support service delivery. This will reduce delays, blockages, and inconsistencies between core PFM processes happening in councils and those happening at central level. Better alignment will result in both smoother interactions between the two levels of government, and build confidence in the overall planning, budgeting, and execution process and reporting. The project will focus on a number of key PFM functions that affect lower levels of government. These include planning, budgeting formulation and execution, flow of funds, accounting and reporting, and internal audit. In addition, the project will support strengthening audit oversight of local councils – both financial and performance audit – by further support for ASSL's role in this process. auditing – with a focus on local level basic services. Interventions will include the development of PFM guidance adapted to local needs, support to implement streamlined processes and procedures, IT systems, staff training and overall support and oversight from central level agencies.

The sub-components include:

Sub-Component 1.1: Better PFM Systems at the central and local level. This sub-component would focus on strengthening key PFM functions to support basic service delivery at local level, including tools, procedures, and skills building for central and local level staff.

Sub-Component 1.2: Improved Procurement Systems in Education and Health: The objective of this sub-component is to increase the transparency and accountability in Government procurement system through the implementation of e-Procurement in the key priority sectors of Education (text books) and Health (drugs, medical equipment). The project supported activities will be part of the wider e-GP roll out strategy of the NPPA for the strengthening of procurement systems reforms in all MDAs.

Sub-Component 1.3: Improved capacity of key technical staff at local councils . The objective of this sub-component is to enhance the skills and capacity of core LC staff, both at the decision making and operational levels, including technical and fiduciary staff. The sub-component will additionally support central government authorities, including the LGSC and MOLG, to enable it to perform its mandated function of ensuring that LCs have staff with the right qualifications aligned to the right functions through putting in place and implementing a comprehensive training plan.

Sub-Component 1.4: A Stronger Local Government audits and external scrutiny: The objective of this sub-component is to improve the oversight of local government. The sub-component will incentivize and support the institutionalization of annual financial audits of local governments and the issuing of audit opinions, which are constitutional requirements and contribute to greater audit impact through effective citizen engagement in the audit process.

Component 2: Local Development

The aim of this project component is to support the inter-governmental fiscal transfer systems, with a focus on local development grant financing. This component will provide support for the implementation of locally-identified development priorities while strengthening core council systems

Sub-Component 2.1: Local government development grants

The financing of local council development grants through this project sub-component pursues two interlinked objectives. Firstly, it will provide much needed additional financing to councils, for the implementation of substantially more locally-identified development priorities, including climate change adaptation and disaster risk reduction. This will work alongside the existing structure of inter-governmental fiscal transfers and provide a regular, predictable, and increasingly significant boost to council spending power during a period where government financing for increased regular transfers is severely constrained as a result of successive economic shocks. Secondly, the grants will incentivize broader capacity development in councils – including the activities taking place in Component 1 – by making grants conditional on achievement of progressively more challenging eligibility criteria related to their institutional functioning, and by providing technical assistance to councils so they are able to access and participate effectively in the grant system.

Sub-Component 2.2: Better project management at the local level.

This sub-component will support a more effective system for financing local councils. A revised Draft National Decentralisation Policy, while recently approved by Cabinet, has not still come into effect. A review and revision of the Local Government Act (2004)—ensuring alignment with the policy—is

anticipated. The FDD has initiated the development of a comprehensive fiscal decentralization policy and strategy that will be anchored on the revised decentralization policy. This sub-component will support the development and implementation of the fiscal decentralization policy along two workstreams: (a) Development of a second-generation inter-governmental fiscal transfer system (IGFTS); and (b) Support to local councils and Chiefdom administrations for better administration, recording and reporting of their own-source revenue collection through development of a revenue mobilization strategy at every local council and related improvement in the relevant systems, procedures, tools, and internal controls. .

Sub-Component 2.3: Contingent Emergency Response Component (CERC)

The component will provide funding following an eligible emergency. The component will include conditions for the use of funds, and will only be triggered when certain actions, as agreed by the Government and Bank teams, are met. These actions include the following: (i) the country experiences an eligible emergency; and (ii) the country presents a sound and actionable country-level response plan. Once triggered, the component will be guided by Investment Project Financing (IPF) Policy, Paragraph 12, which enables rapid reallocation of funds between project components following an emergency. Together with the operational, fiduciary, procurement, disbursement and financial management arrangements that underpin its implementation, the component provides a conduit for additional emergency funds into the project.

Component 3: Integrated data platforms for monitoring and accountability

The component will support the government's proposed reforms to improve data management and reporting at local level through targeted support to the priority education, health sectors and to LCs. The component will address three different levels of support: (1) Support to Local Councils as conveners of data on service delivery investments and performance at the local level, enabling community engagement; (2) Support to data management platforms on the vertical distribution chain of key sectorial spending on local services at the central level in Education (text books, TLM) and Health (drugs, medical supplies); and (3) Technical and operational support to the National Monitoring and Evaluation Directorate (NaMED) to support its collaboration with DSTI and key technical MDAs in Health, Education, and Local Government to provide technical leadership for the introduction of simplified, streamlined and automated data platforms for monitoring and accountability.

Sub-Component 3.1: Improved Systems for Local Council Monitoring and Reporting.

The sub-component activities will strengthen M&E capacity of District Councils and the oversight by MOLG. NaMED will engage with MOLG's M&E unit to provide technical leadership to improve the monitoring and reporting by District Councils on capital investments (including Local Council Development Grants) and recurrent sectoral transfers in priority local level sectors (in particular education and health).

Sub-Component 3.2: Robust Supply Chain Data Platforms for key commodities

This sub-component will support the collaboration between the NaMED and Directorate of Science, Technology and Innovation (DSTI) in its engagement with the MDAs of education and health, to support the recording, control and reporting of distribution through the supply chain, including service delivery dashboards on distribution of (i) textbooks; (ii) TLM, (iii) drugs; and (iv) medical supplies. Data platforms will be designed to allow inputs from citizens, wherever possible, including through Ward Development Committees and community-based organizations (CBOs). It will also support the design and roll-out of innovative digital and offline/online platforms, including GIS-tagging, to facilitate the above.

Sub-Component 3.3: Supporting the demonstration effect of using data platforms for decision-making at local level and two sectors (education, health) towards the development of NaMEMIS.

This component will focus on Technical Assistance (TA) to NaMED to build its collaborations with other key sector MDAs for simplified, streamlined and automated data platforms on monitoring and accountability. It will also support use of data platforms by LCs and central MDAs overseeing management of basic services in education and health as a demonstration effect for an umbrella NaMEMIS.

Component 4: Project Management and Implementation Support (PMIS)

This component will cover the costs of managing the project as well as the specific activities for project monitoring and evaluation (M&E), communication, and outreach. This component will provide project management support to the Ministry of Finance for project implementation, including supporting collaboration with other central and local agencies participating in the project. Component 4 will finance technical, fiduciary and safeguard staff, as well as related administrative and incremental operating costs. The MoF will put in place a dedicated Project Management Unit (PMU) that will include technical, fiduciary, M&E, and safeguards specialists (See Annex 1 for Project Implementation Arrangement details). These staff will directly work with the Fiscal Decentralization Division (FDD), the PFM Reforms Division (PFMRD), and the Project Fiduciary Management Unit (PFMU) that will be responsible for the project's fiduciary aspects (financial planning and budgeting, procurement, disbursement, and audits). Details on the team composition and profiles, with duties and accountabilities, are elaborated in detail in the Project Implementation Manual (PIM). A key activity under this component is the implementation and operation of a robust M&E system supported by the use of a field-appropriate technology (Geo-enabling Initiative for Monitoring and Supervision - GEMS) for digital data collection and analysis.

1.4 Objectives of the Stakeholder Engagement Plan (SEP)

The main objective of this SEP is to define the protocols for stakeholder engagement, including public information disclosure and consultation, throughout the project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and other activities related to the project. The involvement of the local population is essential to the success of the project because it will ensure smooth collaboration between project staff and local communities which will help minimize and mitigate environmental and social risks related to the proposed project activities. Of significance, is to manage stakeholder expectations emanating from project related interventions in a socially and culturally sensitive manner which will enhance the attainment of the objectives of the Accountable Project for Service Delivery project.

Specific objectives of the SEP include the following:

- i. Establish a systematic approach to stakeholder engagement that will help it identify stakeholders, build and maintain a constructive relationship with them, especially project affected parties;
- ii. Assess the level of stakeholder interests and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance;
- iii. Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them;
- iv. Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format;
- v. Provide project-affected parties with accessible, inclusive, and culturally sensitive means to raise issues and grievances, and allow the Government to respond to and manage such grievances effectively.

2.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

The SEP was prepared in February 2021 and the methods used for the preparation of the SEP include the following steps:

- i. Review of relevant documents related to the Accountable Governance project: The main documents reviewed included the draft PAD; existing SEP for recent bank projects such as Resilient Urban Sierra Leone Project (RUSLP) and the COVID-19 Emergency Response project.
- ii. Interviews with individuals and key stakeholder groups relevant to the project: Key individuals and stakeholders who have been identified to play roles during project implementation or have interest in project activities were interviewed (see details attached in annex 1)
- iii. Compilation the information gathered into the draft SEP
- iv. Review of the draft SEP by the Client and Bank
- v. Revise SEP based on comments and inputs from Client and the Bank.

2.1 Stakeholder Identification

Project Stakeholders are individuals, groups or entities who are impacted or likely to be impacted directly or indirectly, positively, or adversely by the project (affected parties). Another category of people may have an interest in the project ('interested parties'). They include individuals or groups whose interests may be affected by the project and who have the potential to influence its outcomes in any way.

Cooperation and negotiation with stakeholders throughout the project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e., the individuals who have been entrusted by their fellow group members with the mandate to advocating the groups' interests during engagements on the project. Stakeholder consultations at various levels because it will help in getting the buy-in of stakeholders into project initiatives which will enhance stakeholder acceptance of the project activities thereby improving the design and implementation of the project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of project-related information and as a primary communication/liaison link between the project and targeted communities and their established networks. It is important to verify stakeholder representatives (i.e., confirm that they are legitimate and genuine advocates of the community/group they represent) before engaging them.

The identification of the various stakeholder groups was done based on the how they will be affected by project activities. The stakeholders identified were then sorted according to their impact on the project and the likely impact the project activities will have on them. Stakeholder analysis is an ongoing process, which may evolve as new stakeholders are introduced to the project. The preliminary stakeholder analysis has identified the various interests of stakeholder groups and the influence these groups may have on the project. The analysis also shaped the design of stakeholder consultation activities and which stakeholders to engage and when.

The following principles for stakeholder engagement shall be applied to ensure best practices are followed in the determination of stakeholders.

- *Openness and life-cycle approach*: Public consultations for the Accountable Governance Project will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation.

- *Informed participation and feedback:* Adequate information will be provided to and widely distributed among all stakeholders in an appropriate format. Opportunities will be provided for communicating stakeholders' feedback as well as analyzing and addressing their comments and concerns.
- *Inclusiveness and sensitivity:* Stakeholder inclusivity shall be given adequate attention so as to build effective relationships and trust. All stakeholders at all times would be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Vulnerable groups as well as the excluded such as women, youth, elderly and persons with disability are to be given special attention within the context of the appropriate cultural sensitivities of those concern.

For the purposes of effective and tailored engagement, stakeholders for the Accountable Governance Project will be divided into the following core categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management of their present conditions.
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their state of vulnerability and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the Accountable Governance Project.

Table 1: List of stakeholders identified under Accountable Governance Project

Project Proponents	Affected Parties	Other Interested Parties	Vulnerable Groups
1. Ministry of Finance 2. Ministry of Local Government and Rural Development 3. Ministry of Planning and Economic Development	1. Local Government Service Commission (LGSC) 2. National Public Procurement Authority (NPPA) 3. Audit Service Sierra Leone (ASSL) 4. Devolved Agencies (<i>Health, Education, Agriculture etc.</i>) 5. Officials at Decentralized agencies at Local Councils 6. Officials at City/Local Councils 7. Councilors 8. Ward/Village Development Committees 9. Community Health Workers/nurses 10. Teachers 11. Agricultural Extension Officers 12. City and Local waste collection and disposal workers 13. Farmers 14. Market women/businesses 15. Youth groups 16. Mammy Queen/Chairman, Persons with disability 17. Project contractors 18. Workers at construction sites of roads, drainage system and other infrastructure 19. Media 20. Civil Society Organizations (CSOs)	1. Ministry of Basic and Secondary School Education 2. Ministry of Health and Sanitation 3. The Ministry of Social Welfare, Gender and Children’s Affairs 4. National Monitoring and Evaluation Directorate (NaMED) 5. Directorate of Science, Technology and Innovation 6. Environment Protection Agency 7. Office of National Security (ONS) 8. National Disaster Management Agency (NaDMA) 9. Local Councils Association of Sierra Leone (LoCASL) 10. Parliament 11. The Anti-Corruption Commission 12. Teacher Unions in Sierra Leone 13. Associations of health workers 14. Parents Association in schools 15. Other Specialized NGOs to address project related issues. 16. The business community 17. Community and religious leaders 18. Association of Contractors 19. Trade Union 20. Drivers/Riders Union	1. Children 2. Women 3. Illiterate people 4. Persons with Addictions 5. Persons with disability 6. Ebola survivors/Covid-19 patients 7. Elderly persons 8. Commercial Sex workers

2.2 Stakeholder Analysis

This section presents detailed analysis of the key stakeholders identified their interest and level of influence on the project activities will be established. This stakeholder analysis will also help in shaping the design of stakeholder consultation activities by specifying the role(s) of each stakeholder group thereby helping in determining which stakeholders to engage, when and where. The process may be reviewed, and new changes effected as other interest groups may be identified at any stage of project implementation. As presented in Table 2, stakeholder analysis determines the likely relationship between stakeholders and the Project, and helps to identify the appropriate consultation methods for each stakeholder group during the life of the project. Some of the most common methods used to consult stakeholders include:

- Phone /email;
- One-on-one interviews;
- Workshop/focus group discussions;
- Distribution of pamphlets and newsletters;
- Public meetings; and
- Newspaper/magazines/radio.
- Posters

When deciding the frequency and the appropriate engagement technique used to consult a particular stakeholder group, three criteria must be considered:

- The extent of impact of the project on the stakeholder group;
- The extent of influence of the stakeholder group on the project; and
- The culturally acceptable engagement and information dissemination methods.

In general, engagement is directly proportional to impact and influence, and as the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used. All engagement should proceed on the basis of what are culturally acceptable and appropriate methods for each of the different stakeholder groups. For example, when consulting government officials, formal presentations are the preferred consultation method, while communities prefer public meetings, and informal focus group discussions facilitated by posters, non-technical pamphlets and other visual presentation aids including models and videos.

Table 2: Analysis of Stakeholder Interest and likely Influence in Project

Stakeholder Group	Role in Project	Interest	Influence
Project Proponents:			
Ministry of Finance	<ul style="list-style-type: none"> • Disbursement of project funds • Government Implementing Agency/Responsible for establishing and chairing Project Steering Committee • Management of project fiduciary activities: procurement, PFM, recruitment, fiscal decentralization, etc. 	High	High

Stakeholder Group	Role in Project	Interest	Influence
	<ul style="list-style-type: none"> • Consultation and coordination on policy issues. 		
Ministry of Local Government and Rural Development	<ul style="list-style-type: none"> • Provide policy guidance for project implementation. • Supervises project implementation at Local Council and city level 	High	High
Ministry of Planning and Economic Development	<ul style="list-style-type: none"> • Provides policy guidance for the preparation of development plans for the LCs. • Introduce reforms, tools and technologies for efficient planning and delivery of basic services. • Monitor the effectiveness of service delivery based on development plans and reforms introduced 	High	High
Affected Parties:			
1. Local Government Service Commission (LGSC)	<ul style="list-style-type: none"> • Prepare a roadmap for improved management and capacity building of technical staff in LCs. • Capacity building of core technical staff of LCs. • Develop a human resource management policy, guidelines and scheme of service for LC staff 	Moderate	Moderate
2. National Public Procurement Authority (NPPA)	<ul style="list-style-type: none"> • Provides policy guidance to enhance public procurement processes in the country. • Introduce reforms and technology in public sector procurement. • Enforce public procurement laws and standards. 	High	High
3. Audit Service Sierra Leone (ASSL)	<ul style="list-style-type: none"> • Undertake performance audits of service delivery. • Enforce financial controls and systems for efficient service delivery. 	High	Moderate
4. Heads of Devolved Agencies (Health, Education, Agriculture etc.)	<ul style="list-style-type: none"> • Provides leadership in the delivery of basic services. • Ensure efficient deployment of personnel to delivery basic services to the citizenry. • Monitor progress of service delivery 	High	High
5. Officials at Decentralized agencies at Local Councils	<ul style="list-style-type: none"> • Implement project activities. • Monitor project activities. • Take and keep data on project activities implemented 	High	High
6. Officials at City/Local Councils	<ul style="list-style-type: none"> • Support project implementation on the ground • Monitor project implementation. • Enforce by-laws pertaining to project implementation. • Ensure compliance to safeguard instruments at council/city level. • Represent community members at key decision taking platforms and or meetings. • Facilitates community mobilization initiatives to support the project 	High	High

Stakeholder Group	Role in Project	Interest	Influence
7. Councilors	<ul style="list-style-type: none"> Support project activities at respective wards Represent ward members at key decision taking platforms and or meetings. Facilitates mobilization initiatives at wards to support the project 	Moderate	Moderate
8. Ward/Village Development Committees	<ul style="list-style-type: none"> Support project activities at respective wards Represent ward members at key decision taking platforms and or meetings. Facilitates mobilization initiatives at wards to support the project. Help in identification of needs 	Moderate	Moderate
9. Community Health Workers/nurses	<ul style="list-style-type: none"> Deliver health related services to community members. Provide monitoring data on delivery of health services. 	Low	Moderate
10. Teachers	<ul style="list-style-type: none"> Provides teaching and learning services to communities. Support in dissemination of project information to school children Provide monitoring data on project activities 	Low	Moderate
11. Agricultural Extension Officers	<ul style="list-style-type: none"> Deliver agricultural related services to community members. Provide monitoring data on delivery of agricultural services. 	Low	Moderate
12. City and Local waste collection and disposal workers	<ul style="list-style-type: none"> Collection and disposal of municipal waste Provides monitoring data on delivery of waste and sanitation related services 	Low	Moderate
13. Farmers	<ul style="list-style-type: none"> Support project activities in their localities 	Low	Low
14. Market women/businesses	<ul style="list-style-type: none"> Voice concerns pertaining to women welfare on project implementation. Comply with information on project particularly on temporary displacement, relocation, and settlement, and associated compensation arrangements. 	Low	Low
15. Youth groups	<ul style="list-style-type: none"> Mouthpiece for the youth Support project activities in localities 	Low	Moderate
16. Mammy Queen/Chairman, Persons with disability	<ul style="list-style-type: none"> Voice issues of concern for persons with disability in project decisions Support project activities that will inure to the benefit of persons with disability 	Low	Low
17. Project contractors	<ul style="list-style-type: none"> Execute contracts awarded on project. Enforce E&S safeguards in their project sites 	Moderate	High

Stakeholder Group	Role in Project	Interest	Influence
18. Workers at project construction sites	<ul style="list-style-type: none"> Comply with all labor, occupational, health and safety protocols for project 	Moderate	Moderate
19. Media	<ul style="list-style-type: none"> Help in dissemination of project information to the public. Hold government accountable during project implementation 	High	High
20. Civil Society organizations	<ul style="list-style-type: none"> Hold government accountable during project implementation 	High	High
Other Interested Parties			
1. Ministry of Basic and Secondary School Education	<ul style="list-style-type: none"> Provides policy guidance on the delivery of education related services. Monitor progress of implementation project activities 	Moderate	Moderate
2. Ministry of Health and Sanitation	<ul style="list-style-type: none"> Provides policy guidance on health and sanitation component of the project. Coordinates the implementation of health components of the project. 	Moderate	Moderate
3. The Ministry of Social Welfare, Gender and Children's Affairs	<ul style="list-style-type: none"> Provide advisory and policy guidance for project activities particularly on compensations to displaced populations due to the project. Provision of support and guidance on GBV/SEA/VAC issues emanating from the project 	Moderate	Moderate
4. National Monitoring and Evaluation Directorate (NaMED)	<ul style="list-style-type: none"> Put in systems to monitor investments in key basic services at local level. Enforce accountability measures in the delivery of basic services 	High	Moderate
5. Directorate of Science, Technology and Innovation	<ul style="list-style-type: none"> Support project with the needed technology and innovation to enhance the delivery of basic services 	High	Moderate
6. Environment Protection Agency	<ul style="list-style-type: none"> Provides environmental regulatory oversight and guidance on project implementation 	High	High
7. Office of National Security	<ul style="list-style-type: none"> Provides advisory policy guidance on disaster risk management 	Moderate	High
8. National Disaster Management	<ul style="list-style-type: none"> Establish a process and structure for a coordinated and effective delivery of assistance and to address the consequences of major disasters declared in country 	Moderate	Moderate
9. Local Councils Association of Sierra Leone (LoCASL)	<ul style="list-style-type: none"> Support project implementation on the ground Monitor project implementation 	Moderate	Moderate

Stakeholder Group	Role in Project	Interest	Influence
10. Parliament	<ul style="list-style-type: none"> • Pass laws and regulations that are necessary to facilitate smooth implementation of project 	Moderate	Moderate
11. The Anti-Corruption Commission	<ul style="list-style-type: none"> • Prevent and control corruption in delivery of basic services • Investigate and prosecute allegations of corruption in delivery of basic services 	Moderate	Moderate
12. Teacher Unions in Sierra Leone	<ul style="list-style-type: none"> • Support implementation of project activities • Mobilize support of members towards project 	Moderate	Moderate
13. Associations of health workers	<ul style="list-style-type: none"> • Support implementation of project activities • Mobilize support of members towards project 	Moderate	Moderate
14. Parents Association in schools	<ul style="list-style-type: none"> • Support implementation of project activities • Mobilize support of members towards project 	Moderate	Moderate
15. Other Specialized NGOs to address project related issues	<ul style="list-style-type: none"> • Support implementation of project activities • Hold government accountable during project implementation 	Low	Low
16. The Businesses Community	<ul style="list-style-type: none"> • Support project implementation processes • Adhere to laws and regulations governing project implementation • Information on local procurement opportunities in project 	Low	Low
17. Community leaders, religious leaders	<ul style="list-style-type: none"> • Ensure compliance to safeguard instruments at council/city level. • Represent community members at key decision taking platforms and or meetings. • Facilitates community mobilization initiatives to support the project 	Moderate	Moderate
18. Association of Contractors	<ul style="list-style-type: none"> • Support in the enforcing standards during project implementation • Support in monitoring project sites • Support in the redress of complaints and grievances among its members 	Moderate	Moderate
19. Trades Union	<ul style="list-style-type: none"> • Support in mobilization of members to support project 	Moderate	Moderate
20. Drivers/Riders Union	<ul style="list-style-type: none"> • Support project activities. 	Moderate	Moderate
Vulnerable Groups			
1. Children	<ul style="list-style-type: none"> • Engage on project and its impacts on children. • Adhere to guidelines on children's involvement in the project 	High	Low
2. Women	<ul style="list-style-type: none"> • Engage women groups on project and explain impacts on women. 	High	Moderate

Stakeholder Group	Role in Project	Interest	Influence
	<ul style="list-style-type: none"> Adhere to guidelines on women's involvement in project 		
3. Illiterate people	<ul style="list-style-type: none"> Engage illiterate population on project. Adhere to information pertaining to the implementation of project 	Low	Low
4. Persons with addiction	<ul style="list-style-type: none"> Provide information to aid delivery of project support to persons with addiction. Adhere to information pertaining to the implementation of project 	Low	Low
5. Persons with disability	<ul style="list-style-type: none"> Engage associations of persons living with disability to factor their needs into project design Provide information to aid delivery of project to persons with disability Adhere to information, rights, and responsibility of persons with disability in project implementation 	High	Moderate
6. Ebola survivors/Covid-19 patients	<ul style="list-style-type: none"> Provide information to aid delivery of project to Ebola survivors/Covid-19 patients Adhere to information rights and responsibility of persons with disability in project implementation 	High	Moderate
7. Elderly persons	<ul style="list-style-type: none"> Provide information to aid delivery of project to elderly persons Adhere to information pertaining to the implementation of project 	Moderate	Low
8. Commercial sex workers	<ul style="list-style-type: none"> Provide information to aid delivery of project to commercial sex workers. Adhere to information pertaining to the implementation of project 	Moderate	Low

3.0 STAKEHOLDER ENGAGEMENT PROCESSES

3.1 Summary of Consultation activities already undertaken

The project proponents have already carried out series of stakeholder engagements as part of the preparation as presented in the table below:

Table 3: Summary of Consultation activities already undertaken

Stakeholder	Purpose of engagement and summary of key decisions taken)	Method of engagement	Location	Date of Consultation/Engagement
PROJECT PREPARATION PHASE				
Principal Deputy Financial Secretary's Office (PDFS)	To complete draft Project Appraisal Document (PAD) for the Accountable Governance Project. Specifically, to do a raft letter for his signature to all beneficiary stakeholder institutions for the Accountable Governance Project to double their efforts to complete the process of developing results milestones and activities including costs. Key decisions/actions A draft letter in ready for the signature of the PDFS to all beneficiary stakeholder institutions to double their efforts to timely submit activities plus costs and, and results milestones.	Physical meetings, emails, phone calls	Freetown	February 22 2021
Fiscal Decentralisation Division (FDD)	To complete draft Project Appraisal Document (PAD) for the Accountable Governance Project. Specifically, Draft manual on Local Development Grant, the allocation criteria for the horizontal distribution of development grants, menu of investments for administering component 3 of the Accountable Governance Project and results milestones and activities including costs of FDD activities to be implemented under component 1. Also engaged with the PMU of the Urban Resilience Project anchored in FDD to support the process of development of the Environmental Safeguard Assessment for the Accountable Governance Project	Physical meetings, emails, phone calls and virtual meetings, the latte mostly with the Bank team	Freetown	January to February 2021

Stakeholder	Purpose of engagement and summary of key decisions taken)	Method of engagement	Location	Date of Consultation/Engagement
	<p><u>Key decisions/actions</u> There is already a draft manual for administering development grant currently under review by key stakeholders. There is a proposed allocation criteria for distributing development grant to the 16 rural district councils Draft menu of investment projects taken from the councils' development plans is been prepared or review</p>			
Public Financial Management Reform Unit (PFMRU)	<p>Results milestones and propose activities for achieving result milestones including costs of the activities <u>Key decisions/actions</u> The result milestones and activities have been submitted for review whilst awaiting costs of the activities. Specifically, the results framework for the proposed activities will be reviewed to span through the life span of the project</p>	Physical meetings, emails, phone calls and virtual meetings, the latte mostly with the Bank team	Freetown	February 2021
Internal Audit Department of MOF	<p>Results milestones and propose activities for achieving result milestones including costs of the activities <u>Key decisions/actions</u> The result milestones and activities including cost have been submitted for review by the Bank. Specifically the results framework for the proposed activities will be reviewed to span through the life span of the project</p>	Physical meetings, emails, phone calls and virtual meetings, the latte mostly with the Bank team	Freetown	January to February 2021
Ministry of Planning and Economic Development (MoPED)	<p>Results milestones and propose activities for achieving result milestones including costs of the activities <u>Key decisions/actions</u> The result milestones, activities and costs have been submitted and the Bank has made few comments. The team is the process of incorporating the comments for submission which will is due 9th Feb 2021</p>	Physical meetings, emails, phone calls and virtual meetings, the latte mostly	Freetown	January to February 2021

Stakeholder	Purpose of engagement and summary of key decisions taken)	Method of engagement	Location	Date of Consultation/Engagement
	Specifically, the results framework is currently under review to span through the life span of the project The PC is to schedule a meeting with the Minister, MoPED the week of 8 th Feb 2021 to further discuss MoPED initial submission for confirmation	with the Bank team		
National Monitoring and Evaluation Division (NaMED) and DSTI, Office of the President	Results milestones and propose activities for achieving result milestones including costs of the activities. Meanwhile the Bank had proposed some results milestones for review by NaMED and DSTI that will inform development and costs of their activities Enhance collaboration between NaMED, DSTI and the Decentralisation Secretariat (Dec-Sec) (especially the M&E aspects for local councils) in the effective planning, execution and reporting of component 2 of the Accountable Governance Project Key decisions/actions The result milestones, activities and costs have been developed and shared with DSTI that promised to provide comment on the submission Monday 8 Feb 2021. Meanwhile, NaMED is to share to the PC and the Bank their initial submission to DSTI, which is still outstanding The collaborative meeting between NaMED, DSTI and Dec-Sec is still outstanding. This will depend on the outcome of DSTI's review of NaMED's initial submission	Physical meetings, emails, phone calls and virtual meetings, the latte mostly with the Bank team	Freetown	January to February 2021
Local Government Service Commission (LGSC), Ministry of Local Government and Rural Development (MLGRD)	Results milestones and propose activities for achieving result milestones including costs of the activities Enhance collaboration between LGSC and the Decentralization Secretariat (Dec-Sec) (especially the Capacity Building aspects for local councils) in the effective planning, execution and reporting of the enhanced capacity	Physical meetings, emails, phone calls and virtual meetings, the latte mostly	Freetown	February 2021

Stakeholder	Purpose of engagement and summary of key decisions taken)	Method of engagement	Location	Date of Consultation/Engagement
	<p>building aspect o component 1 of the Accountable Governance Project</p> <p>Key decisions/actions</p> <p>The result milestones and activities have been submitted for review by the Bank whilst awaiting costs of the activities, which is due 10th Feb 2021. Specifically, the results framework for the proposed activities will be reviewed to span through the life span of the project</p> <p>The collaborative meeting between LGSC and Dec-Sec (Capacity Building aspect) is still outstanding. This depends on the outcome of the joint review by LGSC and Dec-Sec Capacity Building Unit of LGSC's initial submission</p>	with the Bank team		
Public Accounts Committee (PAC), Sierra Leone Parliament	<p>Results milestones and proposed activities for achieving result milestones including costs of the activities</p> <p>Key decisions/actions</p> <p>The result milestones and activities have been submitted for review whilst awaiting costs of the activities, which is due Tuesday 9 Feb 2021. Specifically, the results framework for the proposed activities will be reviewed to span through the life span of the project</p>	Physical meetings, emails, phone calls and virtual meetings, the latte mostly with the Bank team	Freetown	February 2021
E-Government Procurement/National Public Procurement Authority (NPPA)	<p>Results milestones and propose activities for achieving result milestones including costs of the activities. Meanwhile the Bank (Hunt) had proposed some results milestones for review by NPPA that will inform development and costs of their activities</p> <p>A productive follow-up meeting was held with the leadership of NPPA after subsequent meetings (Calls) between the Bank (TTL) and the Chief Executive of NPPA.</p> <p>Key decisions/actions</p>	Physical meetings, emails, phone calls and virtual meetings, the latte mostly with the Bank team	Freetown	January to February 2021

Stakeholder	Purpose of engagement and summary of key decisions taken)	Method of engagement	Location	Date of Consultation/Engagement
	<p>The meeting agreed eGP/NPPA will review proposed results milestones by Hunt (positively) and develop activities including costs to achieve the revised results milestones.</p> <p>The information eGP/NPPA agreed will be submitted by Tuesday 9 Feb 2021</p> <p>The outcome of the submission by eGP/NPPA will inform a virtual meeting between the Bank team, NPPA team and PC team preferably Thursday 11th Feb 2021 to discuss and take position on the submission</p>			

3.2 Stakeholder Engagement Methods

A variety of engagement techniques will be used to engage, consult, and disseminate information to the various stakeholders. The selection of any medium of consultation or engagement will be based on the stakeholder’s level of formal education, inherent needs, and other cultural sensitivities so that the purpose of each engagement will be achieved. The selection of an engagement method will also be influenced by the COVID-19 pandemic. Therefore, the methods of stakeholder engagement will be done taking into consideration all the recommended social distancing protocols in Sierra Leone. In general, a precautionary approach will be taken to the consultation process to prevent the spread of COVID-19. The following guidelines will be considered when selecting channels of communication:

- Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings;
- If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Assess and deploy alternative tools to engage stakeholders such as the use of community radio, use of key community influencers and peer groups, visual aids, and social media;
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

The techniques to be used for the different stakeholder groups have been summarized in the table below:

Table 4: Stakeholder Engagement Methods

Engagement Method	Purpose and Details
Correspondence (Phone, Emails)	<ul style="list-style-type: none"> • Distribute information to the World Bank Group, Government officials, NGOs, Local Government, Impacted Communities, and organisations/agencies. • Invite stakeholders to meetings and follow-up
One-on-one meetings (via zoom, skype, teleconference etc.)	<ul style="list-style-type: none"> • Seek views and opinions. • Enable stakeholders to speak freely about sensitive issues. • Build personal relationships. • Record meetings • Resolve concerns and grievances as appropriate

Formal and informal meetings	<ul style="list-style-type: none"> • Present the Project information to a group of stakeholders. • Allow group to comment – opinions and views. • Build impersonal relation with high level stakeholders. • Disseminate technical information. • Record discussions
Public meetings	<ul style="list-style-type: none"> • Present Project information to a large group of stakeholders, especially communities. • Allow the group to provide their views and opinions. • Build relationship with the communities, especially those impacted. • Distribute non-technical information. • Facilitate meetings with presentations, PowerPoint, posters, brochures etc. • Record discussions, comments, questions.
Focus group meetings	<ul style="list-style-type: none"> • Present Project information to a group of stakeholders • Allow stakeholders to provide their views on targeted baseline information. • Build relationships with communities. • Record responses.
Website/ National news papers	<ul style="list-style-type: none"> • Present project information and progress updates. • Disclose ESIA, ESMP, RAP, SEP, and other relevant project documentation.
Direct communication with affected PAPs	<ul style="list-style-type: none"> • Share information on project impacts and mitigation measures and implementation timelines. • Agree options for neighbourhood upgrade and relocation options. • Participatory development of community action plans.

3.3 Methods of Consulting Disadvantaged / Vulnerable Individuals or Groups

The SEP will make deliberate efforts to sufficiently engage and consult disadvantaged/vulnerable individuals and groups, who often do not have a voice to express their concerns or understand the impacts of a project, are sometimes excluded from stakeholder engagement. Disadvantaged / vulnerable groups faced myriad of challenges which hinder their ability to participate in effectively in consultations. These challenges included; lack of funds to transport members to public consultations, inaccessible public halls for meetings, lack of sign language interpreters, documents not put in braille, lack of consideration for persons suffering from autism and other intellectual disability, and fear of expressing themselves especially among women, children, and other marginalized groups such as drug addicts, commercial sex workers, and Ebola survivors/Covid-19 patients/survivors. Consultations³ will take place to better determine the needs and strategy for community dialogue and awareness raising and will be detailed further. Awareness campaigns, trainings, dissemination activities about the different entry points, among other activities, will ensure the sustainability of the actions taken and will prepare the community to address cases properly in the future, after project completion. In addition, consultations should be conducted in conducive environments, accessible locations and at flexible and comfortable hours of the day. Sessions should be clear and short enough to minimize discomfort. Information to invite people for

³ [Ethics section](#) of the [Violence Against Women and Girls Resource Guide](#).

the consultations should be made accessible for everyone and with sufficient notice to ensure participation of a broad range of stakeholders.

In regard to GBV/SEA, the SEP will be recognizing the gender power and social dynamics within a community and how they may inhibit participation, it is key to ensure that spaces are made available for women, men and children affected by the project to participate in consultations.

Table 5: Methods of Consulting Disadvantaged / Vulnerable Individuals or Groups

Vulnerable groups and individual	Specific Needs and Characteristics	Preferred means of notification/consultation	Additional Resources Required
Physically challenged persons with visual and hearing impairment	Lack of access to meeting places, transportation and language barriers, visual impairment	Meet identifiable associations of persons with disabilities.	Information translated to indigenous languages, sign language/ translators, braille, accessible meeting locations
Women, girls, poor and disadvantaged, children, pregnant school-age girls	Limited voice, low representation, lack of access to information Cultural and traditional barriers, poverty stigma	Focus group meetings, use of gender champions, Focus group meeting with disadvantaged children and their guardians.	Engagement of local NGOs and CBOs who work with vulnerable people at the community level to help disseminate information and organize consultation For women ensure the FGD must be small in number, focused and short meetings where women will be comfortable asking questions or raising concerns; Meetings schedules must not interfere with domestic activities; Venues should be located close to their homes; Meetings to have female facilitators.
Ebola/COVID-19 Survivors	Stigma, limited voice	Focus group meetings, meeting with association of Ebola/COVID-19 survivors.	Engagement of local NGOs to embark on sensitization against Ebola/COVID-19 Survivors
Stakeholders in remote area/ high illiteracy including the homeless	Limited voice, low representation, lack of access to information,	Focus group meetings, engagement at the local level including the use of radio and town hall meetings.	More information dissemination through the local radio and town criers, posters, local language skits and discussions. community

Vulnerable groups and individual	Specific Needs and Characteristics	Preferred means of notification/consultation	Additional Resources Required
			level engagement and consultation than at a district headquarters
Drug addicts, commercial sex workers	Stigma, gender-based violence, limited voice,	Focus group meetings.	Deploy specialized CSOs to engage meaningfully with drug addicts, commercial sex workers

3.4 Stakeholder Engagement Plan (SEP)

The main goal of this SEP is to ensure inclusivity in the decision-making processes at every stage of the project preparation which will create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner. It will also provide sufficient opportunity for the various stakeholder groups to voice their opinions and concerns that may influence project decisions during the project design, implementation, and closure stages. It must be emphasized that the stakeholder engagements methods must be done in accordance with all the required COVID-19 social distancing and safety protocols.

Table 6: Stakeholder Engagement Plan

Project Stage	Topic of consultation	Engagement Technique	Application of the technique	Target Stakeholders	Responsibility
Project Preparation	Agreeing on components and institutional arrangements for the implementation of project	<ul style="list-style-type: none"> • Correspondence (Phone, Emails) • Formal and informal meetings; 	<ul style="list-style-type: none"> • Invite stakeholders to meetings and follow-up • Soliciting stakeholder input into the PAD organisations/agencies 	Ministry of Finance; Ministry of local Government and Rural Development; Ministry of Planning and Economic Development; Local Government Service Commission (LGSC); National Public Procurement Authority (NPPA); Audit Service Sierra Leone (ASSL); Ministry of Basic and Secondary School Education; Ministry of Health and Sanitation; Office of National Security; Local Councils; Development partners; World Bank Group, CSOs	<ul style="list-style-type: none"> • MoF-FDD, PFMRU
	Preparation of safeguard instruments (ESIAs, ESCP, SEP, GBV Action Plan, Labor Management Procedure, GRM, ESMF, etc.)	<ul style="list-style-type: none"> • Correspondence (Phone, Emails); • Formal and informal meetings; 	<ul style="list-style-type: none"> • Invite stakeholders to meetings and follow-up • Soliciting stakeholder input into the safeguard instruments 	Ministry of Finance; Ministry of local Government and Rural Development; Ministry of Planning and Economic Development; Local Government Service Commission (LGSC); National Public Procurement Authority (NPPA); Audit Service Sierra Leone (ASSL); Ministry of Basic and Secondary School Education; Ministry of Health and Sanitation; Office of National Security; Local Councils; Development partners; World Bank Group; CSOs/NGOs/Media; Vulnerable groups; Ward/Village Development Committees; Councillors; Women Groups/Associations; Persons with Disability; Other Specialized NGOs to address project related issues; The Businesses Community; Community/religious leaders; Association of Contractors; Trades Union; Drivers/Riders Union	<ul style="list-style-type: none"> • MoF-FDD, PFMRU • Local Councils
Project implementation	Strategies for improving	<ul style="list-style-type: none"> • Correspondences (Phone, Emails); 	<ul style="list-style-type: none"> • Invite stakeholders to meetings and follow-up 	Ministry of Finance; Ministry of local Government and Rural Development; Ministry of Planning and Economic Development; Local Government	<ul style="list-style-type: none"> • MoF-FDD, PFMRU • MoPED

Project Stage	Topic of consultation	Engagement Technique	Application of the technique	Target Stakeholders	Responsibility
	basic service delivery	<ul style="list-style-type: none"> Formal and informal meetings 	<ul style="list-style-type: none"> Share information on the strategy plan, annual work plan and projects in line with the National Development Plan Deliberate on measures to ensure transparency and accountability in the delivery of basic services such as education, health, agricultural etc. sectors. 	Service Commission (LGSC); National Public Procurement Authority (NPPA); Audit Service Sierra Leone (ASSL); Ministry of Basic and Secondary School Education; Ministry of Health and Sanitation; Office of National Security; Local Councils; Development partners; World Bank Group; CSOs/NGOs/Media; Vulnerable groups; Ward/Village Development Committees; Councillors; Women Groups/Associations; Persons with Disability; Other Specialized NGOs to address project related issues; The Businesses Community; Community/religious leaders; Association of Contractors; Trades Union; Drivers/Riders Union	<ul style="list-style-type: none"> Local Councils
	Strategies for enforcing and updating safeguards instruments	<ul style="list-style-type: none"> Formal and informal meetings 	<ul style="list-style-type: none"> Invite stakeholders to meetings and follow-up Soliciting stakeholder input into the E&S safeguard strategies, 	Ministry of Finance; Ministry of local Government and Rural Development; Ministry of Planning and Economic Development; Local Government Service Commission (LGSC); National Public Procurement Authority (NPPA); Audit Service Sierra Leone (ASSL); Ministry of Basic and Secondary School Education; Ministry of Health and Sanitation; Office of National Security; Local Councils; Development partners; World Bank Group; CSOs/NGOs/Media; Vulnerable groups; Ward/Village Development Committees; Councillors; Women Groups/Associations; Persons with Disability; Other Specialized NGOs to address project related issues; The Businesses Community; Community/religious leaders; Association of Contractors; Trades Union;	<ul style="list-style-type: none"> MoF-FDD, PFMRU Local Councils

Project Stage	Topic of consultation	Engagement Technique	Application of the technique	Target Stakeholders	Responsibility
				Drivers/Riders Union, EPA, Ministry of Environment	
	Discussion on specific reforms to implement specific components of projects	<ul style="list-style-type: none"> • Radio and Television Discussion and Phone-in Programs • Formal and informal meetings 	<ul style="list-style-type: none"> • Enable stakeholders to speak freely about project related issues • Enhance stakeholder understanding and support for project initiatives 	Ministry of Finance; Ministry of local Government and Rural Development; Ministry of Planning and Economic Development; Local Government Service Commission (LGSC); National Public Procurement Authority (NPPA); Audit Service Sierra Leone (ASSL); Ministry of Basic and Secondary School Education; Ministry of Health and Sanitation; Office of National Security; Local Councils; Development partners; World Bank Group; CSOs/NGOs/Media; Vulnerable groups; Ward/Village Development Committees; Councillors; Women Groups/Associations; Persons with Disability; Other Specialized NGOs to address project related issues; The Businesses Community; Community/religious leaders; Association of Contractors; Trades Union; Drivers/Riders Union	<ul style="list-style-type: none"> • MoF-FDD, PFMRU • Component Leads • Local Councils
	Guidelines for compensation to affected individuals and households	<ul style="list-style-type: none"> • Meetings • radio/TV discussions, • engagement with affected individuals and 	<ul style="list-style-type: none"> • Dissemination of information to mass audiences • Solicit inputs into guidelines for social and financial support to affected households 	Ministry of Finance; Ministry of local Government and Rural Development; Ministry of Planning and Economic Development; Local Government Service Commission (LGSC); National Public Procurement Authority (NPPA); Audit Service Sierra Leone (ASSL); Ministry of Basic and Secondary School Education; Ministry of Health	<ul style="list-style-type: none"> • MoF-FDD, PFMRU • Local Councils

Project Stage	Topic of consultation	Engagement Technique	Application of the technique	Target Stakeholders	Responsibility
		household, community leaders etc.		and Sanitation; Office of National Security; Local Councils; Development partners; World Bank Group; CSOs/NGOs/Media; Vulnerable groups; Ward/Village Development Committees; Councillors; Women Groups/Associations; Persons with Disability; Other Specialized NGOs to address project related issues; The Businesses Community; Community/religious leaders; Association of Contractors; Trades Union; Drivers/Riders Union, MLHCP	
	Labor and working conditions associated with project activities	<ul style="list-style-type: none"> • Formal and informal meetings 	<ul style="list-style-type: none"> • Present information on employees contracts • Display information on notice boards, sign posts, radio announcement etc. • Encourage the use of GRM mechanism to address issues on labour and working conditions 	Ministry of Finance; Ministry of Labor and Social Security; Ministry Social Welfare; Local Councils; Contractors; Community leaders, religious leaders; Vulnerable groups; Ward/Village Development Committees; Councillors; Women Groups/Associations; Persons with Disability, Labour Union	<ul style="list-style-type: none"> • MoF-FDD, PFMRU • Local Councils • Contractors
Project Closure	Lessons Learning Sessions	<ul style="list-style-type: none"> • Public online surveys • Focus group meetings • Expert one-on-one interviews • Formal meetings 	<ul style="list-style-type: none"> • Present Project information to a large group of stakeholders, especially communities • Allow stakeholders to provide their views and opinions 	Ministry of Finance; Ministry of local Government and Rural Development; Ministry of Planning and Economic Development; Local Government Service Commission (LGSC); National Public Procurement Authority (NPPA); Audit Service Sierra Leone (ASSL); Ministry of Basic and Secondary School Education; Ministry of Health and Sanitation; Office of National Security; Local Councils; EPA; Development partners; World Bank Group; CSOs/NGOs/Media; Vulnerable groups;	<ul style="list-style-type: none"> • MoF-FDD, PFMRU • Local Councils • Contractors

Project Stage	Topic of consultation	Engagement Technique	Application of the technique	Target Stakeholders	Responsibility
			<ul style="list-style-type: none"> Distribute technical and non-technical information Record discussions, comments, questions. 	Ward/Village Development Committees; Councilors; Women Groups/Associations; Persons with Disability; Other Specialized NGOs to address project related issues; The Businesses Community; Community leaders, religious leaders; Association of Contractors; Trades Union; Drivers/Riders Union	
	<ul style="list-style-type: none"> Sustainability 	<ul style="list-style-type: none"> Public online surveys Focus group meetings Expert one-on-one interviews Formal meetings 	<ul style="list-style-type: none"> Present Project information to a large group of stakeholders, especially communities Allow stakeholders to provide their views and opinions Distribute technical and non-technical information Record discussions, comments, questions. 	Ministry of Finance; Ministry of local Government and Rural Development; Ministry of Planning and Economic Development; Local Government Service Commission (LGSC); National Public Procurement Authority (NPPA); Audit Service Sierra Leone (ASSL); Ministry of Basic and Secondary School Education; Ministry of Health and Sanitation; Office of National Security; Local Councils; EPA; Development partners; World Bank Group; CSOs/NGOs/Media; Vulnerable groups; Ward/Village Development Committees; Councilors; Women Groups/Associations; Persons with Disability; Other Specialized NGOs to address project related issues; The Businesses Community; Community leaders, religious leaders; Association of Contractors; Trades Union; Drivers/Riders Union	<ul style="list-style-type: none"> MoF-FDD, PFMRU Local Councils Contractors
	<ul style="list-style-type: none"> Project Assets 	<ul style="list-style-type: none"> Expert one-on-one interviews Formal meetings 	<ul style="list-style-type: none"> Present Project information to a large group of stakeholders, especially communities Allow stakeholders to provide their views and opinions 	Ministry of Finance; Ministry of local Government and Rural Development; Ministry of Planning and Economic Development; National Public Procurement Authority (NPPA); Audit Service Sierra Leone (ASSL); EPA; Local Councils; Development partners; World Bank Group; Impacted Communities, National Asset Commission, Ministry of Transport	<ul style="list-style-type: none"> MoF (FDD, PFMU) LCs

Project Stage	Topic of consultation	Engagement Technique	Application of the technique	Target Stakeholders	Responsibility
			<ul style="list-style-type: none"> • Distribute technical and non-technical information • Record discussions, comments, questions. 		

3.5 Stakeholder Engagement Strategy

The PMU will ensure meaningful engagement and consultation and disclosure of project information to all relevant stakeholders at each stage of project implementation. The disclosure and consultation activities will be designed along with some key guiding principles, including:

- Wide publicity of consultation activities particularly among the project affected stakeholders/communities, preferably 2 weeks prior to any meeting engagements.
- Making non-technical information summary accessible to stakeholders prior to any event to ensure that people are informed of the assessment and conclusions before scheduled meetings.
- Ensure location and timing of meetings favor stakeholder participation and availability.
- Present information in a clear, and non-technical language(s) where necessary.
- Engagements must be facilitated in ways that allow stakeholders to raise their views and concerns.
- Issues raised must be addressed, at the meetings or at a later time.

Table 7: Stakeholder Engagement/Consultation Strategy

Key Project Preparation Advance (PPA) Activities	Target Stakeholders	Expected discussions and decisions	Locations	Responsibilities
Ascertain Priority Development Needs for effective delivery of basic services at LCs	National MDAs, Devolved Sector heads Core Staff of Devolved Agencies, Core staff at LCs, Ward/Village Development Committee members, Councilors,	Discuss and agree on priority needs and requirements for effective delivery of basic services.	Offices of MDAs, LCs, Various Wards, Communities, offices of CSOs/CBOs/NGOs	MoF-FDD and PFMU in collaboration with MoPED will guide the discussions based the project concept

Key Project Preparation Advance (PPA) Activities	Target Stakeholders	Expected discussions and decisions	Locations	Responsibilities
	Development Planning Officers, Head men, youth groups, women's group, CSOs/CBOs/NGOs			and priorities in national development plans.
Develop Plan for the delivery of basic services at LCs	National MDAs, Devolved Sector heads Core Staff of Devolved Agencies, Core staff at LCs, Ward/Village Development Committee members, Councilors, Development Planning Officers, Head men, youth groups, women's group, CSOs/CBOs/NGOs	Discussion on the priority basic services needed in each LC and strategies to delivering the basic services	Offices of MDAs, LCs, Various Wards, Communities, offices of CSOs/CBOs/NGOs	MoPED
Reforms and strategies for effective service delivery. (central and local levels)	National MDAs, Devolved Sector heads Core Staff of Devolved Agencies, Core staff at LCs, Ward/Village Development Committee members, Councilors, Development Planning Officers, Head men, youth groups, women's group, CSOs/CBOs/NGOs	Discuss the reforms; PMF reforms Procurement reforms Performance audits Integrated data management etc.	Offices of MDAs, LCs, Various Wards, Communities, offices of CSOs/CBOs/NGOs	MoPED
Capacity Development Plan reforms/tools to roll out interventions.	National MDAs, Devolved Sector heads Core Staff of Devolved Agencies, Core staff at LCs, Ward/Village Development Committee members, Councilors, Development Planning	Capacity needs, available capacity and capacity gaps	Offices of MDAs, LCs, Various Wards, Communities, offices of CSOs/CBOs/NGOs	Core and devolved staff identify available skills and capacity building requirement needed to delivery basic services.

Key Project Preparation Advance (PPA) Activities	Target Stakeholders	Expected discussions and decisions	Locations	Responsibilities
	Officers, Head men, youth groups, women's group, CSOs/CBOs/NGOs			
Development of Environmental and social risk assessments and mitigation plans (ESIAs, ESCP, SEP, GBV Action Plan, Labor Management Procedure etc.)	National MDAs, Devolved Sector heads Core Staff of Devolved Agencies, Core staff at LCs, Ward/Village Development Committee members, Councilors, Development Planning Officers, Head men, youth groups, women's group, CSOs/CBOs/NGOs	Environmental and social risk assessments and mitigation	Offices of MDAs, LCs, Various Wards, Communities, offices of CSOs/CBOs/NGOs	Ensure national laws and policies are followed through
Disclosure of Environmental and social risk management plans	Media, EPA, Communities	Environmental and social risk management plans	Offices of MDAs, LCs, Various Wards, Communities, offices of CSOs/CBOs/NGOs	Share information on Environmental and social risk management plans

3.6. Proposed Strategy for Information Disclosure

Stakeholder consultations and information disclosure shall be carried out throughout the project cycle which shall be well planned, inclusive and documented where feedback shall be provided on all follow up issues, concerns, and actions emanating from the stakeholder consultation processes. The engagement and consultation will be carried out on an ongoing basis to reflect the nature of issues, impacts, and opportunities emanating from the implementation of the project.

Table 8: Information Disclosure and Consultation Plan

Project stage	Target stakeholders	List of information to be disclosed	Methods	Timing proposed

Implementation	<ul style="list-style-type: none"> • Officials at MoF-FDD • PMU • LCs • Development partners • World Bank Group • PAPs • General Public 	<ul style="list-style-type: none"> • ESMF • SEP • GRM • LMP • ARAP 	<ul style="list-style-type: none"> • News paper • Website • Online and ICT enabled • Radio • Town Hall Meetings 	One month after project effectiveness Throughout project implementation
	<ul style="list-style-type: none"> • The public • Impacted Communities, • Traders Association • Traders/Market women • Transport operators and commuters • SMEs 	<ul style="list-style-type: none"> • Detailed project information (Beneficiary LCs, likely impact of project, etc.) • ESMF, ESMP, SEP, GRM 	<ul style="list-style-type: none"> • Radio and phone in interaction with public • Television • Social media • News paper • Posters and brochures 	<ul style="list-style-type: none"> • Before project implementation is started
	<p>Vulnerable Groups:</p> <ul style="list-style-type: none"> • Residents in slums or informal settlements and flood-prone or inaccessible areas. • Physically challenged persons with visual and hearing impairment • Women, girls, poor and disadvantaged children pregnant school age girls • Ebola/COVID-19 Survivors • Stakeholders in high illiterate areas • Drug addicts, commercial sex workers 	<ul style="list-style-type: none"> • ESMF, ESMP, LMP, SEP, GRM and other relevant project documentation. • Project information and progress updates 	<ul style="list-style-type: none"> • Engagement with specialized agencies dealing with these stakeholders to employ the most appropriate means of engagement. 	<ul style="list-style-type: none"> • Throughout project implementation
Construction/ Rehabilitation	<ul style="list-style-type: none"> • Landowners • PAPs (including informal occupants), • Residents/businesses in construction area • Vulnerable groups, • Municipal waste collectors • The public 	ESMP ARAP LMP	Limited informal meetings Website National news papers Notice boards at construction sites/communities	<ul style="list-style-type: none"> • Two months after project effectiveness. • Throughout project implementation

	<ul style="list-style-type: none">• Ministry of Lands• Contractors• Workers (including Stewards for afforestation sub-project)• Traders/Market women• Transport operators and commuters• SMEs			
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4.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1. Resources

The FDD and PFMRU will provide oversight and supervision in implementing the SEP. The FDD will also ensure the hiring of the required personnel to implement the project including the roll out of activities related to SEP. In addition, the FDD will ensure that the required funds are allocated and disbursed for the implementation of the SEP. A proposed budget for the stakeholder engagement activities is outlined below:

Table 9: Proposed Budget for the Accountable Governance Project SEP

Budget Item	Cost (USD)
General expenses for SEP implementation (travel, printing, and community engagements):	
Local Travel	20,000
Printing - including IEC materials	10,000
Community/ public Engagement	50,000
Additional expenses on resource persons on SEP activities	20,000
Other (contingency)	40,000
Total	140,000

4.2. Management Functions and Responsibilities

The Ministry of Finance through the Fiscal Decentralization Division (FDD) and the PFM Reform Unit will provide overall oversight for the implementation of the stakeholder engagement activities. The FDD and PFMRU will coordinate the establishment of the Project Management Unit (PMU) that will be responsible for the implementation of project activities.

5.0 GRIEVANCE REDRESS MECHANISM (GRM)

There shall be a comprehensive project wide GRM that will provide opportunities for affected parties channel their concerns, questions, and complaints to the various implementation agencies through multiple grievance uptake channels. The GRM will have a trained specialist to address any related issues and complaints.

Essentially, the Grievance Redress Mechanism (GRM) will assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. It will ensure transparent and credible process for fair, effective resolution of grievances thereby building trust and cooperation stakeholders. Specifically, the GRM:

- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.
- Avoids the need to resort to judicial proceedings as a way of seeking redress.
- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during project implementation.

5.1 The Grievance Redress Mechanism Process

The Social Safeguards Specialist at the PMU will lead in managing the GRM processes including disseminating all relevant information about the GRM processes to the various stakeholders from national to the districts and community levels. He/she shall provide systems for anonymous reporting in ways that the identifies of complainants will be protected. This will largely create an enabling environment to allow for grievances to be raised by project affected persons without fear of victimisation. A focal person (s) shall be assigned to man the call/documentation center and ensure timely escalation of complaints and grievances to the resolving officers.

5.2 Scope of the GRM

The GRM for the Accountable Governance Project will be available for use by all project stakeholders including those directly and indirectly impacted-positively or negatively. This will offer an opportunity to project affected persons to submit questions, concerns/complaints, comments, suggestions and obtain resolution or feedback.

5.3 Implementation Steps of GRM

Grievance Redress Committee shall be established to ensure timely and appropriate resolution of grievances arising as a result of project activities. The coordination responsibility of the GRM shall rest with the Social Safeguards Specialist and the focal persons of the call/report centers. Complaints can be registered through calls, text messages, emails or voice mail, and suggestion boxes etc. at all project sites and communities. Once complaints are received at the call or report centre(s), they will be forwarded to the GRM Committee or the appropriate bodies, persons or pillar leads for resolution. Specifically, the following responsibilities shall be adhered to by the team;

- i. Ensure that committees investigate grievances and propose appropriate measures to avoid or minimize adverse impacts of the interventions;
- ii. Ensure that the processes comply with existing safeguard procedures and policies;
- iii. Build the capacity of focal persons in effective community engagement, grievance handling, and negotiation and conflict resolution;
- iv. Build trust and maintain rapport by providing affected persons and the wider public with adequate information on the project and its GRM procedures;
- v. Follow up with GRM committee on the status of investigations and resolution of grievances, as well as communicating outcomes with complainants;
- vi. Regularly provide a report on GRM results to the project proponents and the World Bank.

The GRM implementation process will involve the following steps which have been summarized in table 10: (Include here an introductory paragraphs that explains the GRM procedures, uptake process and GRC levels and the make-up of each committee

Table 10: Steps in Project-specific Grievance Handling Processes

GRM stages	Description of tasks	Responsibility	Timeline
Assign Focal Persons (FP)	The Social Safeguards Specialist liaise with stakeholders to identify Focal Persons to manage the designated grievance call/documentation centers.	Social Safeguards Specialist GBV Specialist Community Outreach Specialist	Prior to project implementation
Train assigned focal persons on the design and operation of the GRM	Train Focal Persons on grievance redress processes	Social Safeguards Specialist GBV Specialist Community Outreach Specialist	Prior to project implementation
Receive, transfer and register complaints	Focal Persons receives and register complaints into the grievances register .	Focal Persons	1 working day after receiving complaint
Screen and refer complaints	Once complaints are received Focal Person will undertake preliminary assessment of the eligibility of complaints and acknowledge receipts of complaints to complainant within 2 workings days. The complaint will also be transferred at this stage to the resolving officer or party or grievance committee that will be set up.	Social Safeguards Specialist of PMU	2 working days after receiving complaints
Assess the complaint	Once transferred to the appropriate resolving officer, the focal person will undertake further assessment to	Social Safeguards Specialist GBV Specialist	Ongoing

	establish the eligibility of the complaint, and hence determine its gravity (classified in terms of high, medium, and low severity)	Community Outreach Specialist	2 working days
Formulate an initial response	Once the assessment is completed, the concerned focal person will formulate a response and communicate with the Social Safeguards Specialist, who would then contact the complainant. The communication should state whether the grievance has been accepted or rejected, providing reasons for the decision, and indicate next steps.	Social Safeguards Specialist Focal Persons	2 working days
Select a resolution approach	Where the complaint is not of fraud or corruption, working with the Social Safeguards Specialist, the GRM Committee will investigate and resolve complaints and where applicable to a specialised body or an appropriate pillar focal person will assign the complaint for mediation at different levels, engage in direct negotiations and dialogue, facilitate negotiations through a third party, conduct further investigation through the review of documents, etc.	Social Safeguards Specialist Focal Person GRM Committee	Ongoing 3 working days after receiving complaints
Settle the issues (or further escalate the issues)	The Social Safeguards Specialist will ensure that the GRM Committee takes appropriate measures to remove the cause of the grievance and initiate a monitoring process to assess any further impacts of project-related work. Once settled, the social safeguards specialist and focal person record the complaint in the system as 'resolved', and inform the complainant of the outcome of the resolution process. Where not addressed, the complainant is informed about the next steps in the grievance redress process including options open to them, and the outcome recorded accordingly.	Social Safeguards Specialist Focal Person GRM Committee	Ongoing 5 working days after registering complaint
Monitor and evaluate grievance redress process	The PMU through the Social Safeguards Specialist Focal Persons will monitor the grievance redress process and the implementation of the decisions made. The Social Safeguards Specialist will work with focal persons to ensure that redress is granted to affected persons in	Social Safeguards Specialist Focal Person GRM Committee	Ongoing

	a timely and efficient manner. They will also provide regular reports to the Bank, noting the progress of implementation of grievance resolutions, timelines of grievance redress, documentation procedures, etc. The project will capture in the grievance log, e.g. Name of the person submitting the complaint (unless kept confidential), Details of the complaint, Name of person assigned to deal with the complaint, Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions, Details of whether the complainant was satisfied with the resolution, etc.		
Feedback to complainant and other interested parties	The GRM System will be updated once the complaint has been resolved so as to close the complaint in the GRM System. The PMU will contact the complainant, to evaluate if the complainant is satisfied with the resolution before the complaint is closed in the GRM system. If the complainant is not satisfied with the outcome of the investigation, a judiciary alternative could apply.	PMU	Ongoing

The GRM for the Accountable Governance Project will embed in its systems to gather and refer GBV and Sexual Exploitation and Abuse (SEA) related grievances. The project will have a robust approach to the GBV and SEA by providing survivors with different entry points to report, including an NGO service provider with strong capacity to respond to GBV. The team will identify partners that can ethically manage a GBV-GRM.

The SEP would be an effective mechanism to set up and monitor community feedback, and especially so that appropriate modalities are in place for SEA/H. Therefore, the SEP will consider establishing community feedback mechanisms for possible healthcare providers focusing on overall service provision (including adequacy of the response, areas where corrective action would be needed) and this would also cover SEA/H.

5.4 Key Stakeholders in the GRM Process

The GRM will require all project stakeholders to actively participate in the identification, recording and resolution of grievances. Specific roles and responsibilities are outlined in the table below;

Table 11: Stakeholder Roles and Responsibilities in GRM Processes

Actor	Role
Ministry of Finance	Provides implementation oversight and ultimate responsibility for the resolution of all grievances
Project Fiduciary Management Unit	Responsible for all fiduciary activities under the project
GRM Report Centre	General Platform that receive/record/log/document, screen and refers all project related complaint to appropriate channels for investigation and resolution
GRM focal person	Detects or investigate and resolve any complaint pertaining to the project
LGSC	Provide supervisory role on local councils' cooperation on the project and help in the area of giving directives on relevant sector policies to guide grievance redress at LCs.
PMU	Responsible for management of the grievance redress mechanism
Grievance Redress Committee	Receive/record/log/document, re-investigation and resolve all project related complaints
NGO	Appropriate partners/NGOs with capacity to provide the necessary technical backstopping to project implementation process
Local councils/Ward Committees	WCs would be responsible for community level grievance redress
Councilors	Provide frontline support to grievance redress at the community and ward levels

5.5 Contractor GRM

The project is expected to engage contractors and other third party entities who will be required to comply with agreed standards and practices including the need for effective resolution of complaints and grievances associated with the activities of contractors and other third party entities. Therefore, it is advisable to build the capacity of the contractors and other third-party suppliers about their commitment and obligation to ensuring worker welfare and safety in the communities they operate which must be included as performance clauses in the contractual agreement. The PMU must periodically undertake on-site monitoring to check compliance of the third-party entities with the employee management requirement.

Workers hired by contractors must have the right to submit grievances regarding workplace concerns without the threat of adverse employment action or prejudice. Complaints may range from dissatisfaction with work hours and rest periods to claims of coercion, intimidation, or abuse. In order to facilitate the expression of these complaints:

- The contractor must work with the workers or their representatives to establish and maintain an effective grievance mechanism through which workers can lodge complaints.
- Workers grievance and complaints boxes must be put in place at places where workers can lodge their complaints.
- The contractors must inform all workers about the grievance mechanisms put in place.
- The grievance mechanism should serve three key functions. First, it should serve as a focal point of communication across the organization where workers can report and receive advice on their concerns and grievances and from which concerns and grievances are channeled to management. Second, the mechanism should be mandated to identify remedies to be implemented through

internal procedures in the form of corrective action, mediation, settlement, or dispute resolution. Third, the mechanism should have the capacity to direct complainants or hand over cases to appropriate external mechanisms, including state-based mechanisms, such as courts.

- The internal grievance redress mechanism should not in any way prejudice the complainant's ability to seek recourse through external mechanisms.
- The contractor/employer must examine all grievances pursuant to its pre-established grievance procedure.
- Any worker filing a grievance must receive notice of the contractor/employer's findings regarding his or her particular complaint and whether corrective action will be taken.

6.0 MONITORING, EVALUATION AND REPORTING

A project monitoring and evaluation system will operate within the PMU to assess progress on indicators in the Project's result framework. Data on activities and outputs will be included in regular monthly and quarterly reports prepared by the PMUs based on inputs from the implementing LCs and other agencies. The M&E Specialist at the PMU will be responsible for collating the data from the LCs and provide quality assurance to the overall reporting processes.

The project M&E plan for implementation of Development Grants would be enhanced by the design and implementation of a Geo-enabling Initiative for Monitoring and Supervision (GEMS) system. The Project M&E team would collect data at subproject level through quarterly physical and financial progress submitted by LCs, complemented with the use of field-appropriate technology for digital data collection and analysis. The use of GEMS would not only support the monitoring of physical progress, but it would also allow to collect citizens feedback on local investments financed under the project. Project will finance the costs of implementing GEMS that include consultancies, logistics costs and other equipment.

6.1 Involvement of Stakeholders in Monitoring Activities

A participatory system of monitoring and reporting on all project activities and related impacts shall be adopted. The key stakeholders to be involved in the participatory monitoring system will comprise representatives from the PMU, Local Councils, Implementing Agencies, Affected Communities, and Development Partners etc. Involving different stakeholders in the monitoring processes will promote strong, constructive, and responsive relationships among the key Project stakeholders and the implementing agency. Effective involvement of relevant stakeholders in the monitoring and reporting of project activities will not only improve the environment and social sustainability of the projects but will also enhance stakeholder acceptance of the project thereby improving the design and implementation of the project. The monitoring framework for the project will also include putting in place systems to keep track of the commitments made to various stakeholder groups at various times, and communicate the progress made against these commitments on a regular basis.

The PMFRU under the MoF, shall provide overall coordination, monitoring, and evaluation of the project by putting in place the requisite tools and systems in place to collect, analyze, and report all information to relevant stakeholders. The Stakeholder Engagement Plan (SEP) will be published on the MoF official website, and updated regularly detailing public consultations, disclosure information and grievances throughout the project, which will be available for public review on request. Qualified and experienced experts in the field should evaluate the Stakeholder Engagement Plan periodically to reflect relevant changes as may be required.

6.2 Reporting back to Stakeholder Groups

The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP and communicated to key stakeholder of the project in a timely manner.

Key Performance Indicators (KPIs) will be monitored by responsible staff and monthly summaries and internal reports on public grievances, enquiries, related incidents, together with the status of implementation of associated corrective/preventative actions generated and conveyed to the World Bank

and all other relevant stakeholders. Publication of status/annual report on stakeholder interaction on the project among others shall constitute one of the possible ways of conveying information to stakeholders.

Table 12: Monitoring and Evaluation Plan for SEP

Indicator Name	Definition/Description	Frequency	Data source	Methodology for Data Collection	Responsibility for Data Collection
Goal:					
Improved accountability and management of resources to deliver basic services more effectively at the local level responsive to community needs, across all districts.	This measures the extent to which project results are delivered without any major environmental and social risks	Annual	Annual survey	Conduct stakeholder satisfaction survey on implementation of project	PMU & C/LCs
Outcomes:					
Percentage of registered grievances resolved within three months of registration (Percentage)	This measures the extent to which grievances are promptly addressed	quarterly	project quarterly reports	grievance log	PMU & C/LCs
Stakeholders satisfied with project activities/outputs	This measures the extent to which key stakeholders are satisfied with project activities.	Bi-annual	Bi-monthly survey	Conduct bi-annual stakeholder satisfaction survey on project activities in their localities	PMU & C/LCs
Beneficiaries who are satisfied with the participatory planning process (Percentage)	This measures the extent to which key stakeholders are satisfied with project activities.	annually	annual beneficiary surveys	Beneficiary survey	PMU & C/LCs

functionality and quality of GBV service provision	This measures the extent to which the project makes available Psychosocial, health, legal, safe home services to GBV survivors	quarterly	project quarterly report	Grievance log.	PMU & C/LCs
No. of LC audits carried out by ASSL using AMIS and community engagement	Measures the extent to which AMIS is operations and used in ASSLs audits	Quarterly	Project quarterly report	AMIS	PMU & C/LCa
Local Councils that have mainstreamed community participation (50% women members) during planning, implementation and monitoring of Annual Investment Plans (Number	Measures the extent to local communities and women are included in community planning processes	Quarterly	Project Quarterly report	Field visits/ beneficiary survey	PMU & C/LCa
Outputs:					
Key stakeholders identified	This measures the number and types of stakeholders identified for engagement during project implementation	Biannually	Stakeholder register for project	Review project documents at PMU & C/LCs	PMU & C/LCs
Key stakeholders consulted	This measures the number of consultations carried with key stakeholders before and during project implementation	Monthly	Stakeholder consultation reports	Review project documents at PMU & C/LCs	PMU & C/LCs
Key stakeholders engaged	This measures the number and types of stakeholders during project preparation and implementation	Monthly	Reports on stakeholders engaged	Review project documents at PMU & C/LCs	PMU & C/LCs

Key project information disclosed	This measures the number and type of project information disclosed	Monthly	SEP, reports on information disclosure	Review project documents at PMU & C/LCs	PMU & C/LCs
Key issues/topics stakeholders are consulted or engaged on	This measures the number and types of issues or topics stakeholders are consulted or engaged on	Monthly	SEP ESCP	Review project documents at PMU & C/LCs	PMU & C/LCs
Grievances recorded	This measures the number and types of grievances recorded as a result of project activities	Monthly	GRM reports E&S reports	Review project documents at PMU & C/LCs	PMU & C/LCs
Grievances resolved	This measures the number and types of grievances resolved as a result of project activities		GRM reports E&S reports	Review project documents at PMU & C/LCs	PMU & C/LCs

ANNEXES

Annex 1: Stakeholders Consulted during the assignment

Name of Stakeholder Group	Topics Discussed	Person interviewed	Mode of consultation	Date of Interview
Western Area Rural District Council (WARDC)	<ul style="list-style-type: none"> Anticipated role in project Anticipated stakeholders to engage. Issues to be consulted on Mode of engagements and resources required 	Raman Tom Farmar (Chief Administrator)	Email interview	31 st January, 2021
Tonkolili District Council		Abdul Koroma (Chief Administrator)	Email interview	2 nd February, 2021
Port Loko City Council		Amara Augustine Sam (Chief Administrator)	Email interview	1 st February, 2021
Port Loko City Council		Mohamed S. Mansaray (Deputy Chief Administrator)	Email interview	2 nd February, 2021
Koidu New Sembehun City Council		Mohamed Madina Bah (Finance Officer)	Email interview	1 st February 2021

Koidu New Sembehun City Council		Henry Powell (Deputy Chief Administrator)	Email interview	3 rd February, 2021
Ministry of Planning and Economic Development		Alpha K. Bangura (Director)	Email interview	3 rd February, 2021
Bo District Council		Abdul Bangura (Finance Officer)	Email interview	1 st February, 2021
Port Loko City Council		Mohamed Dumbuya (Accountant)	Email interview	
Bombali District Assembly		Vivian S. Senesie (Chief Administrator)	Email interview	2 nd February, 2021
Koidu New Sembehun City Council (KNSCC)		Mayor	Email interview	3 rd February, 2021
Kenema City Council		Yarawah Kargbo (Development Planning Officer)	Email interview	2 nd February, 2021
Siera Leone Union on Disability Issues (SLUDI)		Santigie Kargbo (National President)	Email interview	3 rd February, 2021
Market Women Association	<ul style="list-style-type: none"> • Information they need to know • Preferred medium of engagement or consultation • Challenges in accessing information and other basic services 	Kadie Paul Winner – President National Market Women Secretariat	Phone (whatsapp)	16 th February, 2021
		Haja Marie Bob Kandeh – President Sierra Leone Market Women Association	Phone (whatsapp)	16 th February, 2021
		Haja Amina Tarawally – Chairlady Market Women Association Makeni	Phone (whatsapp)	16 th February, 2021
		Ya Alimamay Haja Sesay – Chairlady Market Women Association, PortLoko	Phone (whatsapp)	16 th February, 2021
		Donis Fabulleh, Chair lady Market women Association, Bo	Phone (whatsapp)	16 th February, 2021