

**THE GOVERNMENT OF SIERRA LEONE  
MINISTRY OF FINANCE (MOF)**

---

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

---

**SIERRA LEONE SECOND FINANCIAL INCLUSION PROJECT  
(P177947)**

*April 2023*

## ACRONYMS

| Acronym | Full Meaning  |
|---------|---|
| ASSL    | Audit Service Sierra Leone                                      |
| BSL     | Bank of Sierra Leone  |
| CBOs    | Community Based Organizations                                   |
| CERC    | Contingent Emergency Response Component                         |
| CSOs    | Civil Society Organizations                                     |
| E&S     | Environmental and Social  |
| EPA     | Environment Protection Agency                                   |
| ESCP    | Environment and Social Commitment Plan                          |
| ESIA    | Environmental and Social Impact Assessment                      |
| ESMP    | Environmental and Social Management Plan                        |
| ESMF    | Environmental and Social Management Framework                   |
| FIU     | Financial Intelligence Unit                                     |
| GBV     | Gender-Based Violence   |
| GDP     | Gross Domestic Product  |
| GEMS    | Geo-enabling Initiative for Monitoring and Supervision          |
| GoSL    | Government of Sierra Leone                                      |
| GRC     | Grievance Redress Committee                                     |
| GRM     | Grievance Redress Mechanism                                     |
| IA      | Implementing Agency   |
| IDA     | International Development Association (of the World Bank Group) |
| IPF     | Investment Project Financing                                    |
| KPIs    | Key Performance Indicators                                      |
| LoCASL  | Local Councils Association of Sierra Leone                      |
| LCs     | Local Council   |
| LGSC    | Local Government Service Commission                             |
| LOC     | Line of Credit  |
| MDAs    | Ministries, Departments, and Agencies                           |
| MFIs    | Micro Finance Institutions (MFIs)                               |
| MoF     | Ministry of Finance   |
| MSMEs   | Micro Small and Medium sized Enterprises                        |
| MSWGCA  | Ministry of Social Welfare, Gender and Children's Affairs       |
| NASSIT  | National Social Security and Insurance Trust                    |
| NBFIs   | Non-Bank Financial Institutions (NBFIs)                         |
| NGO     | Non-Governmental Organization                                   |
| NPPA    | National Public Procurement Authority                           |
| PAD     | Project Appraisal Document                                      |
| PAI     | Project Area of Influence                                       |
| PAP     | Project-affected Persons  |
| PDO     | Project Development Objective                                   |
| PFIs    | Participating Financial Institutions                            |
| PIU     | Project Implementation Unit                                     |
| NPS     | National Payment Systems  |
| RAP     | Resettlement Action Plan  |
| PWDs    | Persons with Disabilities                                       |

|         |  |
|---------|--|
| RUSLP   | Resilient Urban Sierra Leone Project                         |
| SALPOST | Sierra Leone Postal Service Ltd                              |
| SEA/SH  | Sexual Exploitation and Abuse                                |
| SEP     | Stakeholder Engagement Plan                                  |
| SH      | Sexual Harassment  |
| SMEDA   | Sierra Leone Small and Medium Enterprises Development Agency |
| SMEs    | Small and Medium Enterprises                                 |
| SSA     | Sub-Saharan Africa   |
| TA      | Technical Assistance   |
| UNCDF   | UN Capital Development Fund                                  |
| WB      | World Bank   |

## TABLE OF CONTENTS

### Contents

|   |    |
|---|----|
| ACRONYMS .....  | 1  |
| TABLE OF CONTENTS.....  | 3  |
| LIST OF TABLES .....  | 4  |
| EXECUTIVE SUMMARY .....   | 5  |
| 1.0 INTRODUCTION/PROJECT DESCRIPTION .....  | 7  |
| 1.1 Country Context .....   | 7  |
| 1.2 Sectoral and Institutional Context .....  | 7  |
| 1.3 Project Description .....   | 8  |
| 1.3.1. Project Components .....   | 9  |
| 1.3.2 Project Beneficiaries .....   | 9  |
| 1.4 Key National Legislation and Policies on Stakeholder Engagement and Information Disclosure..... | 11 |
| 1.5 Objectives of the Stakeholder Engagement Plan (SEP).....  | 14 |
| 2.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS .....   | 15 |
| 2.1 Stakeholder Identification .....  | 15 |
| 2.2 Stakeholder Analysis.....   | 18 |
| 3.0 STAKEHOLDER ENGAGEMENT PROCESSES.....   | 22 |
| 3.1 Summary of Consultation activities already undertaken.....                                      | 22 |
| 3.2 Stakeholder Engagement Methods.....   | 24 |
| 3.3 Methods of Consulting Disadvantaged / Vulnerable Individuals or Groups .....                    | 25 |
| 3.4 Stakeholder Engagement Plan (SEP).....  | 27 |
| 3.5 Stakeholder Engagement Strategy .....   | 32 |
| 3.6. Proposed Strategy for Information Disclosure.....  | 35 |
| 4.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES .....         | 37 |
| 4.1. Resources .....  | 37 |
| 4.2. Management Functions and Responsibilities.....   | 38 |
| 5.0 GRIEVANCE REDRESS MECHANISM (GRM).....  | 39 |

|  |    |
|--|----|
| 5.1 The Grievance Redress Mechanism Process.....                 | 39 |
| 5.2 Scope of the GRM.....  | 39 |
| 5.3 Implementation Steps of GRM .....                            | 39 |
| 5.4 Key Stakeholders in the GRM Process .....                    | 42 |
| 5.5 Worker GRM.....  | 42 |
| 5.6 Grievance Redress Mechanisms for SEA/SH/ GBV Survivors ..... | 43 |
| 6.0 MONITORING, EVALUATION AND REPORTING.....                    | 44 |
| 6.1 Involvement of Stakeholders in Monitoring Activities.....    | 44 |
| 6.2 Reporting back to Stakeholder Groups .....                   | 44 |

**LIST OF TABLES**

|   |    |
|---|----|
| Table 1: List of stakeholders identified under the Sierra Leone Financial Inclusion Project ..... | 17 |
| Table 2: Analysis of Stakeholder Interest and likely Influence in Project .....                   | 18 |
| Table 3: Summary of Consultation activities already undertaken.....                               | 22 |
| Table 4: Stakeholder Engagement Methods.....  | 24 |
| Table 5: Methods of Consulting Disadvantaged / Vulnerable Individuals or Groups.....              | 26 |
| Table 6: Stakeholder Engagement Plan .....  | 28 |
| Table 7: Stakeholder Engagement/Consultation Strategy.....  | 33 |
| Table 8: Information Disclosure and Consultation Plan .....                                       | 35 |
| Table 9: Proposed Budget for the Financial Inclusion Project SEP .....                            | 38 |
| Table 10: Steps in Project-specific Grievance Handling Processes .....                            | 40 |
| Table 11: Stakeholder Roles and Responsibilities in GRM Processes .....                           | 42 |
| Table 12: Monitoring and Evaluation Plan for SEP .....  | 46 |

## 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 Sierra Leone Financial Inclusion Phase 2 Project. The Government of Sierra Leone (GoSL), through the Ministry of Finance, is getting a financial grant from the World Bank to implement the Sierra Leone Financial Inclusion Phase 2 Project. The Project Development Objective (PDO) is to facilitate the financial inclusion of individuals and micro, small and medium sized enterprises (MSMEs). The main project beneficiaries are those Sierra Leonian individuals and businesses that are currently not financially included. A specific focus is on targeting women and women-owned enterprises to reduce disparities in access to finance for women and Persons with Disabilities (PWDs). Direct beneficiaries of the project will include:

- Individuals and businesses that will benefit from an improved payments and credit infrastructure, financial education and consumer protection.
- Individuals and businesses that will benefit from the new products and services available under the project. It is also envisioned that this project will have a relatively significant impact on residents of rural areas, through facilitating expansions of financial access points.
- MSMEs that will benefit from increased access to credit.
- Financial institutions that will utilize the improved payments and credit infrastructure, and those that benefit from the Lines of Credit (LOC) and strengthened lending capabilities. Mobile money operators will benefit from increased use of their e-money services and expansion of their agent network.
- BSL and the Ministry of Finance will benefit from progress on their financial inclusion targets, better cash management through digitalization of government payments, and institutional capacity building.

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

- i. Component 1: Adoption and usage of transaction accounts
- ii. Component 2: Increasing access to credit for MSMEs
- iii. Component 3: Project management, monitoring and evaluation
- Component 4: Contingent emergency response component (CERC)

The preparation of the project stakeholders was done taking into consideration all available 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 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 etc.

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 PIU.

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 including those on GBV 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 Country Context**

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 Sierra Leone is still one of the poorest countries in the world, facing multiple development challenges, including poverty, high youth unemployment, weak institutions, and a North-South ethno-regional divide. Sierra Leone's per capita gross domestic product (GDP) at US\$480 in 2021 remains at almost the same level as it was after independence in 1961. The country's national poverty rate declined by 5.6 percentage points over the past decade but remains high at 56.8 percent.<sup>1</sup> Sierra Leone is ranked nearly at the bottom of most development metrics and has the fifth lowest life expectancy globally (54 years).

The economy of Sierra Leone experienced several setbacks during 2022, as external spillovers from the Russian invasion of Ukraine aggravated domestic macroeconomic vulnerabilities. This led to slower growth, higher prices, a substantially weaker currency, greater imbalances in public finances, and thinner external buffers. A net negative terms-of-trade shock slowed growth to 3 percent, disrupting an encouraging post-COVID post-recovery of 4.1 percent growth in 2021. High global energy and fertilizer prices coupled with a weaker currency and high pent-up consumption demand translated into accelerating inflationary pressures. Primarily driven by food and energy prices, inflation rose from 12 percent in 2021 to 27 percent in 2022, threatening the welfare of households and worsening food insecurity and poverty.

Domestic factors that magnified economic vulnerabilities and complicated macroeconomic management compounded external shocks. The fiscal position deteriorated in 2022 in a marked departure from the expected path of fiscal consolidation. The fiscal deficit increased to nearly 10 percent of GDP in 2022, driven by a combination of macroeconomic headwinds and policy slippages. This unbudgeted increase in the deficit was financed with increased holdings of government securities by the central bank, further fueling inflation and currency depreciation. Furthermore, Sierra Leone is highly exposed to various external shocks, which disproportionately affect the poor. Over the past 25 years, the country has experienced more than 30 natural disasters, out of which 10 were floods. Disasters in Sierra Leone have high immediate and long-lasting impacts on people; micro, small, and medium enterprises (MSMEs); local and national economies, and the government's budget.

### **1.2 Sectoral and Institutional Context**

Sierra Leone has one of the lowest financial inclusion levels in Sub-Saharan Africa (SSA), constraining the ability of people and firms to recover from the prolonged adverse economic shocks. Financial resilience is an important aspect of financial inclusion – that is when one has access to appropriate financial tools (such as accounts at a formal financial institution or mobile money provider, digital payments, credit) that can be used in a well-regulated environment to meet one's needs. Yet, according the 2021 Global Findex database, only 29 percent of the adult population in Sierra Leone has an account with a formal financial institution or a mobile money provider, which is significantly less than the Sub-Saharan African average (55 percent) and low-income countries' average (39 percent). Furthermore, more than half of these account owners (15 percent) have a mobile money account as their main account, significantly less than in many comparator countries, such as Liberia (23 percent) and Ghana (29 percent). There is a substantial gap in account ownership between men and women of 8 percentage points, with only 25 percent of women having an account (vs. 33 percent of men), which is slowing national progress in financial inclusion.

---

<sup>1</sup> World Bank. 2019. Poverty and Shared Prosperity in Sierra Leone, 2011-2018C



Access to basic formal financial services is almost half that of urban location in rural locations, with account ownership rates of 22 percent among rural dwellers compared with 39 percent among their urban counterparts. The main reasons people do not have accounts include insufficient funds (89 percent), lack of necessary documentation (32 percent), the high costs of financial services (22 percent), and long distances to financial service providers (20 percent).

Access to credit is particularly low, which is central to the ability of micro, small and medium enterprises (MSMEs) to invest in economic recovery. Because MSMEs are one of the largest sources of employment and livelihood, their resilience is at the core of any economic recovery effort. Based on the 2017 World Bank (WB) Enterprise Survey in Sierra Leone, access to finance was identified by 44 percent of small firms as the most significant constraint. It is likely to remain the major challenge considering COVID-19 caused disruptions and persistently high government security yields of around 25 percent that disincentivize banks from lending to the private sector. According to the latest available data, only 17 percent of the SMEs in Sierra Leone have outstanding loans or lines of credit. In 2017, about 70 percent of SMEs had an account at a formal financial institution, but this did not translate to access to credit.

Crowding-out by government securities is a major contributor to the extremely shallow private sector credit market in Sierra Leone. The private financial sector in Sierra Leone is the second shallowest in Africa (after South Sudan)<sup>2</sup>. Private sector credit to GDP fell from 6.2 percent in 2019 to 6.0 percent in 2020 partly due to a COVID-19-induced decline in real sector activities (Figure 2). This places the ratio fourth from the bottom out of 185 countries with data, and less than a sixth of the average for Sub-Saharan Africa (exc. high-income countries), which was 37.9 percent. This is mainly due to the fact that government T-bills yield around 25 percent per year, which is appealing to the banks. As a result, about half of all commercial bank assets are invested in government securities. This results in lack of appetite to bank especially with MSMEs and also lack of motivation to innovate and offer products that could meet the demand.

The proposed Sierra Leone Financial Inclusion Phase 2 Project is therefore intended to contribute to building resilience in the context of the prolonged adverse economic shocks. The scope of the project is specifically geared towards contributing to building resilience with the digital financial services and access to finance interventions (i.e., through Economic Emergency Recovery Fund for a line of credit for MSMEs that have been directly affected by the prolonged exogenous shocks) and the strengthening of institutional capacity and systems of the Bank of Sierra Leone so they are better able to support MSME access to finance and responsible financial inclusion.

### **1.3 Project Description**

The Project Development Objective (PDO) is to facilitate the financial inclusion of individuals and micro, small and medium sized enterprises (MSMEs) which will be achieved by expanding the adoption and usage of transactional accounts, digital financial services, and access to finance for individuals and MSMEs using services provided by sound financial institutions.

The PDO indicators of success include:

- Increase in the percent of adults with basic transaction accounts at a formal financial institution or mobile money provider (gender disaggregated)
- Increase in the percent of adults who made or received a digital payment in the last year (gender disaggregated)

---

<sup>2</sup> World Bank, 2020, Domestic Private Credit to GDP, of 185 countries with data

- Number of PFIs that launch innovative products under Economic Emergency Resilience LOC

### ***1.3.1. Project Components***

The Proposed Project has four components which are summarized below:

#### **Component 1: Adoption and usage of transaction accounts**

The objective of this component would be to support adoption and usage of transaction accounts at a formal financial institution or mobile money provider. It comprises three inter-related sub-components addressing key barriers related to limited financial access points (sub-component 1.1) and other payment systems infrastructure development needs (sub-component 1.2), and legal and regulatory barriers and low financial literacy/capability levels (sub-component 1.3). These measures aim to contribute to broader adoption and usage of transaction accounts and digital finance in Sierra Leone, including as a store of value and as a steppingstone for the poor to more advanced financial services.

#### **Component 2: Increasing access to credit for MSMEs**

The objective of this component is to facilitate sustainable access to innovative affordable credit for MSMEs, in particular women-led businesses, and those at risk from climate change. This set of financial sector activities are intended to protect access to financial services for MSMEs affected by the current economic emergency conditions. It comprises three inter-related sub-components addressing three key impediments to sustainable lending by financial institutions to MSMEs, namely the lack of reasonably priced long-term local currency liquidity for Micro Finance Institutions (MFIs) and Non-Bank Financial Institutions (NBFIs)- (sub-component 2.1), the lack of supervisory capacity (sub-component 2.2), and the lack of a modern credit information system covering non-banks (sub-component 2.3).

#### **Component 3: Project management, monitoring and evaluation**

This component will support: (1) Government and other actors capacity strengthening for the coordination, design, and implementation; (2) the administrative, technical, financial management, environment and social safeguards of the project by the Project Implementation Unit (PIU) under the oversight of Project Steering Committee; (3) the coordination among all institutional partners to ensure the efficient flow of information among all actors and coordination with the private sector; (4) the establishment of a monitoring and evaluation mechanism of the project's results and impact; and (5) the development of communication activities to publicize and disseminate project results, best practices, and success stories. (6) project grievance mechanism (7) Environmental and social implementation and monitoring

#### **Component 4: Contingent emergency response component (CERC)**

In line with the World Bank's Operational Policy OP8.00, the PIU would also house a CERC. This is a provisional zero amount component to allow for rapid reallocation of loan proceeds from other project components during an emergency such as a natural or constructed disaster or crisis that has caused or is likely to cause a major adverse economic or social impact. To trigger this component, the government must declare an emergency or provide a statement of fact justifying the request for activating the use of emergency funding.

### ***1.3.2 Project Beneficiaries***

The main project beneficiaries are those Sierra Leonian individuals and businesses that are currently not financially included. A specific focus is on targeting women and women-owned enterprises to reduce disparities in access to finance for women and Persons with Disabilities (PWDs). Direct beneficiaries of the project will include:

- Individuals and businesses that will benefit from an improved payments and credit infrastructure, financial education and consumer protection.
- Individuals and businesses that will benefit from the new products and services available under the project. It is also envisioned that this project will have a relatively significant impact on residents of rural areas, through facilitating expansions of financial access points.
- MSMEs that will benefit from increased access to credit.
- Financial institutions that will utilize the improved payments and credit infrastructure, and those that benefit from the Line of Credit (LOC) and strengthened lending capabilities. Mobile money operators will benefit from increased use of their e-money services and expansion of their agent network.
- Bank of Sierra Leone (BSL) and the Ministry of Finance will benefit from progress on their financial inclusion targets, better cash management through digitalization of government payments, and institutional capacity building.

The project proposes to finance activities to support financial inclusion in Sierra Leone over five years for US\$30 million. Under component 1, the proposed project supports activities to facilitate adoption and usage of basic transaction accounts. The core strategy is to facilitate the expansion of digital financial access points and further development of the national payment systems infrastructure. Supported by a stronger enabling environment, these measures aim to contribute to broader adoption of transaction accounts and digital finance in Sierra Leone – including as a store of value and as steppingstone for the poor to access more advanced financial services. Under component 2, the proposed project facilitates sustainable access to credit for MSMEs. The proposed project would include a mix of technical assistance, training, specific investments in payments and credit information systems, and a line of credit for MSMEs. Component 3 supports project management, monitoring and evaluation and component 4 would house the Contingent Emergency Response Component (CERC).

The proposed project design will support various IDA19 corporate priorities, including gender climate change and disability inclusion. The project will incorporate features to increase women's access to basic financial services and reduce physical, institutional, and digital barriers in order to increase accessible financial services and products to PWDs. These include reforms to strengthen adoption and usage of basic transaction accounts, DFS, and access to finance for women-led MSMEs and reforms to improve the business environment (for example, credit and collateral registry participation, and access to finance). The project offers targeted activities under component 2 to facilitate women's access to finance, in particular for women-led MSMEs, through an LOC; and technical assistance (TA) to PFIs to develop innovative credit products that do not rely on traditional forms of collateral that women typically lack and to improve their outreach to women customers. The project will aim to monitor the extent to which activities are contributing toward closing gender gaps by measuring, among other things, (1) the number credit registry users who are women, (2) the number of women-led MSMEs that get a loan through the LOC supported under the project, and (3) the number of innovative financing products launched by PFIs for women-led businesses. By supporting increasing adoption and usage of transaction accounts and DFS, which will substantially reduce travel by all economic actors to physical locations (for example, to the bank or to pay bills or receive payments), the project will support climate change mitigation and adaptation. The project activities will also help to build resilience to the effects of climate change by enabling services such as payments, savings, credit, insurance, remittances, and government transfers that can provide critical

support for those managing new environmental realities. For instance, the modern credit registry will help to offer lending more efficiently and affordably.

#### **1.4 Key National Legislation and Policies on 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 PIU in collaboration with the Local Councils will actively engage and consult project stakeholders especially those at the community level and other disadvantaged groups of the society.

##### ***The Banking Act, 2011***

Being an Act to provide for the licensing of persons carrying on banking business, the regulation and supervision of banking activities, the protection of depositors and to provide for other related matters with a view to developing and promoting a safe and sound banking system in Sierra Leone.

##### ***National Payment Systems (NPS) Act, 2022 (Act 8 of 2022)***

The NPS Act sets out the procedures and systems for a safe, secure, and efficient payment system in the country that will protect users of the payment services and instruments.

##### ***NASSIT Act, 2001 (Act 5)***

This Act established The National Social Security and Insurance Trust (NASSIT) to administer a Social Security Scheme that provides financial security to all employees in Sierra Leone in the form of Old Age, Invalidity and Survivors' Benefits based on Social Insurance principles

##### ***National Revenue Authority Act, 2002 as amended in 2022 (Act 21 of 2022)***

This Act established the National Revenue Authority as the central body for the assessment and collection of national revenue, to provide for the administration and enforcement of certain laws and related matters on revenue management in the country.

##### ***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 Financial Inclusion 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 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.

### **ESS 10: Stakeholder Engagement and Information Disclosure**

ESS10 establishes a systematic approach to stakeholder engagement, while ensuring that appropriate information on project risks and impacts are provided to stakeholders in a timely, comprehensive, accessible and appropriate manner. The standard also ensures inclusive and effective engagement of project affected parties throughout the project cycle and provides avenues for assessing stakeholder interest and incorporating their views into project design and monitoring of projects.

As part of meeting the requirements of ESS 10, borrowers are to undertake meaningful consultation and engagement of stakeholders throughout the project life cycle. They are also expected to disclose relevant project information, safeguards report, notably, Stakeholder Engagement Plans as part of fulfilling the requirement of this standard. ESS10 also requires borrowers to set up grievance redress systems that are transparent, culturally appropriate, objective, discrete, accessible as well as sensitive and responsive to the needs of aggrieved persons

### **1.5 Objectives of the Stakeholder Engagement Plan (SEP)**

The main objective of this SEP is to define the procedures 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 Sierra Leone Financial Inclusion Phase 2 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 April 2023 and the methods used for the preparation of the SEP include the following steps:

- i. Review of relevant documents related to the Financial Inclusion project: The main documents reviewed included the draft PAD; existing SEP for recent bank projects such as Resilient Urban Sierra Leone Project (RUSLP), the Financial Inclusion for Basic Service Delivery Project, 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 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 Financial Inclusion 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 Sierra Leone Financial Inclusion Phase 2 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 Sierra Leone Financial Inclusion Project.

***Table 1: List of stakeholders identified under the Sierra Leone Financial Inclusion Project***

| Project Proponent  | Affected Parties  | Other Interested Parties   | Vulnerable Groups  |
|--|---|--|--|
| <ol style="list-style-type: none"> <li>1. Ministry of Finance</li> </ol> | <ol style="list-style-type: none"> <li>1. Bank of Sierra Leone</li> <li>2. Participating Financial Institutions (PFIs)</li> <li>3. Commercial Banks</li> <li>4. Deposit-taking MFIs</li> <li>5. Credit-only MFIs</li> <li>6. Financial Services Associations</li> <li>7. Apex Bank</li> <li>8. NASSIT</li> <li>9. Telecommunication Companies</li> <li>10. Market Women/MSMES</li> <li>11. Importers and Exporters Association</li> <li>12. Insurance Companies</li> <li>13. Individuals</li> </ol> | <ol style="list-style-type: none"> <li>1. Ministry of Trade and Industry</li> <li>2. Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA)</li> <li>3. Sierra Leone Small and Medium Enterprises Development Agency (SMEDA).</li> <li>4. Employers Association</li> <li>5. Workers Union/Association</li> <li>6. Trades Union</li> <li>7. Local Government Service Commission (LGSC)</li> <li>8. National Public Procurement Authority (NPPA)</li> <li>9. Audit Service Sierra Leone (ASSL)</li> <li>10. Devolved Agencies (<i>Health, Education, Agriculture etc.</i>)</li> <li>11. Youth groups</li> <li>12. Mammy Queen/Chairman, Persons with disability</li> <li>13. Media/ Civil Society Organizations (CSOs)</li> <li>14. Local Councils Association of Sierra Leone (LoCASL)</li> <li>15. Parliament</li> <li>16. The Anti-Corruption Commission</li> <li>17. The business community</li> <li>18. Community and religious leaders</li> <li>19. Drivers/Riders Union</li> <li>20. UN Women and Other Development Partners</li> </ol> | <ol style="list-style-type: none"> <li>1. Women</li> <li>2. Illiterate people</li> <li>3. Persons with disability</li> <li>4. Elderly persons</li> <li>5. Youth</li> <li>6. People living in remote communities</li> <li>7. Community Elders</li> <li>8. Ebola survivors/Covid-19 survivors</li> </ol> |

## 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
- Feedback/response collection
- Opinion collection
- engagements

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 |
|----------------------------|---|----------|-----------|
| <b>Project Proponents:</b> |   |          |           |
| Ministry of Finance        | <ul style="list-style-type: none"> <li>• Main implementing agency for project</li> <li>• Disbursement of project funds</li> </ul> | High     | High      |

| Stakeholder Group   | Role in Project  | Interest | Influence |
|---|--|----------|-----------|
|   | <ul style="list-style-type: none"> <li>• Management of project fiduciary activities: procurement, PFM, recruitment, fiscal decentralization, etc.</li> </ul>                                   |          |           |
| <b>Affected Parties:</b>  |  |          |           |
| Bank of Sierra Leone  | <ul style="list-style-type: none"> <li>• Lead implementing agency for projects</li> <li>• Provides regulatory oversight on project implementation</li> </ul>                                   | High     | Influence |
| Participating Financial Institutions (PFIs)                           | <ul style="list-style-type: none"> <li>• Uptake project services</li> <li>• Enforce project policy directives</li> <li>• Create awareness and make services available to the public</li> </ul> | Moderate | Moderate  |
| Commercial Banks  | <ul style="list-style-type: none"> <li>• Uptake project services</li> </ul>  | Moderate | Moderate  |
| Deposit-taking MFIs   | <ul style="list-style-type: none"> <li>• Enforce project policy directives</li> </ul>  | Moderate | Moderate  |
| Credit-only MFIs  | <ul style="list-style-type: none"> <li>• Create awareness and make services available to the public</li> </ul>   | Moderate | Moderate  |
| Financial Services Associations                                       | <ul style="list-style-type: none"> <li>• Uptake project services</li> </ul>  | Moderate | Moderate  |
| Apex Bank   | <ul style="list-style-type: none"> <li>• Enforce project policy directives</li> </ul>  | Moderate | Moderate  |
| NASSIT  | <ul style="list-style-type: none"> <li>• Enforce project directives in its operations</li> </ul>   | Moderate | Moderate  |
| Telecommunication Companies   | <ul style="list-style-type: none"> <li>• Support project with complementary products and services to reach the wider public</li> </ul>   | Moderate | Moderate  |
| Market Women/MSMES  | <ul style="list-style-type: none"> <li>• Uptake project services</li> <li>• Mouthpiece for market women and MSMES</li> </ul>   | Moderate | Moderate  |
| Importers and Exporters Association                                   | <ul style="list-style-type: none"> <li>• Uptake project services</li> </ul>  | Moderate | Moderate  |
| Insurance Companies   | <ul style="list-style-type: none"> <li>• Uptake project services</li> </ul>  | Moderate | Moderate  |
| <b>Other Interested Parties</b>                                       |  |          |           |
| Ministry of Trade and Industry  | <ul style="list-style-type: none"> <li>• Enforce policy directives in trade</li> </ul>   | Moderate | Moderate  |
| Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA)    | <ul style="list-style-type: none"> <li>• Represent the welfare of women in project implementation</li> </ul>   | Moderate | Moderate  |
| Sierra Leone Small and Medium Enterprises Development Agency (SMEDA). | <ul style="list-style-type: none"> <li>• Uptake project products and services in their operations</li> </ul>   | Moderate | Moderate  |

| Stakeholder Group                                       | Role in Project   | Interest | Influence |
|---|---|----------|-----------|
| Employers Association                                   | <ul style="list-style-type: none"> <li>Uptake project products and services in payment of employees</li> </ul>  | Moderate | Moderate  |
| Workers Union/Association                               | <ul style="list-style-type: none"> <li>Uptake project products and services in receiving salary and other financial benefits from employers</li> </ul>  | Moderate | Moderate  |
| Trades Union  | <ul style="list-style-type: none"> <li>Serve as mouthpiece of all traders</li> <li>Assist in promoting acceptance of project</li> </ul>   | Moderate | Moderate  |
| Local Government Service Commission (LGSC)              | <ul style="list-style-type: none"> <li>Uptake project products and services</li> <li>Enforce project directives among Local Councils (LCs)</li> </ul>   | Moderate | Moderate  |
| National Public Procurement Authority (NPPA)            | <ul style="list-style-type: none"> <li>Uptake project products and services in all public procurement</li> </ul>  | Moderate | Moderate  |
| Audit Service Sierra Leone (ASSL)                       | <ul style="list-style-type: none"> <li>Undertake performance audits of service delivery.</li> <li>Enforce financial controls and systems for efficient service delivery.</li> </ul>             | Moderate | Moderate  |
| Devolved Agencies (Health, Education, Agriculture etc.) | <ul style="list-style-type: none"> <li>Uptake project products and services in transactions</li> </ul>  | Moderate | Moderate  |
| Youth groups  | <ul style="list-style-type: none"> <li>Mouthpiece for the youth</li> <li>Support project activities in localities</li> </ul>  | Low      | Moderate  |
| Mammy Queen/Chairman, Persons with disability           | <ul style="list-style-type: none"> <li>Mouthpiece for women and persons with disability</li> <li>Support project activities in localities</li> </ul>  | Low      | Moderate  |
| Media/ Civil Society Organizations (CSOs)               | <ul style="list-style-type: none"> <li>Support in creating awareness about project</li> </ul>   | Low      | Low       |
| Local Councils Association of Sierra Leone (LoCASL)     | <ul style="list-style-type: none"> <li>Uptake project products and services</li> <li>Enforce project directives in transaction at LCs</li> </ul>  | Moderate | Moderate  |
| Parliament  | <ul style="list-style-type: none"> <li>Enact laws to support project implementation</li> <li>Help create awareness about project</li> </ul>   | moderate | moderate  |
| The Anti-Corruption Commission                          | <ul style="list-style-type: none"> <li>Prevent and control corruption in project delivery</li> <li>Investigate and prosecute allegations of corruption in delivery of basic services</li> </ul> | moderate | Moderate  |
| The business community                                  | <ul style="list-style-type: none"> <li>Uptake project products and services</li> </ul>  | Low      | Moderate  |

| <b>Stakeholder Group</b>                    | <b>Role in Project</b>   | <b>Interest</b> | <b>Influence</b> |
|---|--|-----------------|------------------|
| Community and religious leaders             | <ul style="list-style-type: none"> <li>Promote community acceptance of project</li> </ul>  | Low             | Low              |
| Drivers/Riders Union                        | <ul style="list-style-type: none"> <li>Uptake project products and services</li> </ul>   | Low             | Low              |
| UN Women and Other Development Partners     | <ul style="list-style-type: none"> <li>Support project activities both financial and logistics</li> </ul>  | Moderate        | Moderate         |
| <b>Vulnerable Groups</b>                    |  |                 |                  |
| Women                                       | <ul style="list-style-type: none"> <li>Engage women groups on project and explain impacts on women.</li> <li>Adhere to guidelines on women's involvement in project</li> </ul>   | Low             | Low              |
| Illiterate people                           | <ul style="list-style-type: none"> <li>Engage illiterate population on project.</li> <li>Adhere to information pertaining to the implementation of project</li> </ul>  | Low             | Low              |
| Persons with disability                     | <ul style="list-style-type: none"> <li>Engage associations of persons living with disability to factor their needs into project design</li> <li>Provide information to aid delivery of project to persons with disability</li> <li>Adhere to information, rights, and responsibility of persons with disability in project implementation</li> </ul> | Low             | Low              |
| Elderly persons/pensioners                  | <ul style="list-style-type: none"> <li>Provide information to aid delivery of project to elderly persons</li> <li>Adhere to information pertaining to the implementation of project</li> </ul>   | Low             | Low              |
| Ebola survivors/Covid-19 patients/survivors | <ul style="list-style-type: none"> <li>Provide information to aid delivery of project to elderly persons</li> <li>Adhere to information pertaining to the implementation of project</li> </ul>   | Low             | 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 |
|----------------------------------|---|---|----------|---------------------------------|
| <b>PROJECT PREPARATION PHASE</b> |   |   |          |                                 |
| Bank of Sierra Leone             | Presented the summary of project activities for women and explained the benefits they stand to gain from project. | Physical meetings, emails, phone calls and virtual meetings | Freetown | November 2022                   |
| Ministry of Finance              | The meetings were also used to seek the support and cooperation for the project                                   | Physical meetings, emails, phone calls and virtual meetings | Freetown | November 2022                   |
| National Revenue Authority       | Presented the summary of project activities for women and explained the benefits they stand to gain from project. | Physical meetings, emails, phone calls and virtual meetings | Freetown | November 2022                   |
| Ecobank MF                       | The meetings were also used to seek the support and cooperation for the project                                   | Physical meetings, emails, phone calls and virtual meetings | Freetown | November 2022                   |
| SALPOST                          | Presented the summary of project activities for women and explained the benefits they stand to gain from project. | Physical meetings, emails, phone calls and virtual meetings | Freetown | November 2022                   |
| Apex Bank                        | The meetings were also used to seek the support and cooperation for the project                                   | Physical meetings, emails, phone calls and virtual meetings | Freetown | November 2022                   |
| BRAC Microfinance limited        | Presented the summary of project activities for women and explained the benefits they stand to gain from project. | Physical meetings, emails, phone calls and virtual meetings | Freetown | November 2022                   |

| <b>Stakeholder</b>   | <b>Purpose of engagement and summary of key decisions taken)</b>   | <b>Method of engagement</b>                                 | <b>Location</b> | <b>Date of Consultation/Engagement</b> |
|--|--|---|-----------------|--|
| SME Association  | The meetings were also used to seek the support and cooperation for the project  | Physical meetings, emails, phone calls and virtual meetings | Freetown        | November 2022                          |
| Leasing Companies  | Presented the summary of project activities for women and explained the benefits they stand to gain from project.  | Physical meetings, emails, phone calls and virtual meetings | Freetown        | November 2022                          |
| Financial Intelligence Unit (FIU)                                  | The meetings were also used to seek the support and cooperation for the project  | Physical meetings, emails, phone calls and virtual meetings | Freetown        | November 2022                          |
| UNCDF  | Presented the summary of project activities for women and explained the benefits they stand to gain from project.  | Physical meetings, emails, phone calls and virtual meetings | Freetown        | November 2022                          |
| Women's Groups   | Presented the summary of project activities for women and explained the benefits they stand to gain from project.<br>The meetings were also used to seek the support and cooperation for the project | Physical meetings, emails, phone calls and virtual meetings | Freetown        | November 2022                          |
| Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA) | To discuss modalities aimed at strengthening the gender mainstreaming into the project   | Physical meetings, emails, phone calls and virtual meetings | Freetown        | February 2023                          |
| UN Women   | To discuss modalities aimed at strengthening the gender mainstreaming into the project   | Physical meetings, emails, phone calls and virtual meetings | Freetown        | February 2023                          |



### 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.

- 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. Telephonic contacts may 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"> <li>• Distribute information to the World Bank Group, Government officials, NGOs, Local Government, Impacted Communities, and organisations/agencies.</li> <li>• Invite stakeholders to meetings and follow-up</li> </ul>  |
| One-on-one meetings (via zoom, skype, teleconference etc.) | <ul style="list-style-type: none"> <li>• Seek views and opinions.</li> <li>• Enable stakeholders to speak freely about sensitive issues.</li> <li>• Build personal relationships.</li> <li>• Record meetings</li> <li>• Resolve concerns and grievances as appropriate</li> </ul>   |
| Formal and informal meetings                               | <ul style="list-style-type: none"> <li>• Present the Project information to a group of stakeholders.</li> <li>• Allow group to comment – opinions and views.</li> <li>• Build impersonal relation with high level stakeholders.</li> <li>• Disseminate technical information.</li> <li>• Record discussions</li> </ul>                    |
| Public meetings  | <ul style="list-style-type: none"> <li>• Present Project information to a large group of stakeholders, especially communities.</li> <li>• Allow the group to provide their views and opinions.</li> <li>• Build relationship with the communities, especially those impacted.</li> <li>• Distribute non-technical information.</li> </ul> |

| Engagement Method                       | Purpose and Details   |
|---|---|
|   | <ul style="list-style-type: none"> <li>• Facilitate meetings with presentations, PowerPoint, posters, brochures etc.</li> <li>• Record discussions, comments, questions.</li> </ul>   |
| Focus group meetings                    | <ul style="list-style-type: none"> <li>• Present Project information to a group of stakeholders</li> <li>• Allow stakeholders to provide their views on targeted baseline information.</li> <li>• Build relationships with communities.</li> <li>• Record responses.</li> </ul>           |
| Website/ National news papers           | <ul style="list-style-type: none"> <li>• Present project information and progress updates.</li> <li>• Disclose ESIA, ESMP, RAP, SEP, and other relevant project documentation.</li> </ul>   |
| Direct communication with affected PAPs | <ul style="list-style-type: none"> <li>• Share information on project impacts and mitigation measures and implementation timelines.</li> <li>• Agree options for neighbourhood upgrade and relocation options.</li> <li>• Participatory development of community action plans.</li> </ul> |

**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. Consultations<sup>3</sup> 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 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/SH, 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.

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

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

| <b>Vulnerable groups and individual</b>                             | <b>Specific Needs and Characteristics</b>   | <b>Preferred means of notification/consultation</b>   | <b>Additional Resources Required</b>   |
|---|---|---|--|
| Women, girls, poor and disadvantaged, youth                         | Limited voice, low representation, lack of access to information<br>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<br>For women ensure the FGD must be small in number, focused and short meetings where women will be comfortable asking questions or raising concerns;<br>Meetings schedules must not interfere with domestic activities;<br>Venues should be located close to their homes;<br>Meetings to have female facilitators. |
| 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 level engagement and consultation than at a district headquarters   |
| 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  |
| Elderly/ Pensioners   | 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 level engagement and consultation than at a district headquarters   |
| 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   |

### **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.

**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"> <li>• Correspondence (Phone, Emails)</li> <li>• Formal and informal meetings;</li> </ul>  | <ul style="list-style-type: none"> <li>• Invite stakeholders to meetings and follow-up</li> <li>• Soliciting stakeholder input into the PAD organisations/agencies</li> </ul>   | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women’s Groups Ministry of Social Welfare, Gender and Children’s Affairs (MSWGCA), UN Women, World Bank | <ul style="list-style-type: none"> <li>• MoF</li> <li>• BSL</li> </ul> |
|                        | Preparation of safeguard instruments (ESIAs, ESCP, SEP, GBV Action Plan, Labor Management Procedure, GRM, ESMF, etc.) | <ul style="list-style-type: none"> <li>• Correspondence (Phone, Emails);</li> <li>• Formal and informal meetings;</li> </ul> | <ul style="list-style-type: none"> <li>• Invite stakeholders to meetings and follow-up</li> <li>• Soliciting stakeholder input into the safeguard instruments</li> </ul>  | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women’s Groups Ministry of Social Welfare, Gender and Children’s Affairs (MSWGCA), UN Women, World Bank | <ul style="list-style-type: none"> <li>• MoF</li> <li>• BSL</li> </ul> |
| Project implementation | Strategies for improving basic service delivery   | <ul style="list-style-type: none"> <li>• Correspondence (Phone, Emails)</li> <li>• Formal and informal meetings</li> </ul>   | <ul style="list-style-type: none"> <li>• Invite stakeholders to meetings and follow-up</li> <li>• Share information on the strategy plan, annual work plan and projects in line with the National Development Plan</li> </ul> | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women’s Groups Ministry of Social Welfare, Gender and Children’s Affairs (MSWGCA), UN Women, World Bank | <ul style="list-style-type: none"> <li>• MoF</li> <li>• BSL</li> </ul> |

| Project Stage | Topic of consultation   | Engagement Technique  | Application of the technique   | Target Stakeholders   | Responsibility   |
|---------------|---|---|--|---|--|
|               |   |   | <ul style="list-style-type: none"> <li>Deliberate on measures to ensure transparency and accountability in the delivery of basic services such as education, health, agricultural etc. sectors.</li> </ul> |   |  |
|               | Strategies for enforcing and updating safeguards instruments                | <ul style="list-style-type: none"> <li>Formal and informal meetings</li> </ul>  | <ul style="list-style-type: none"> <li>Invite stakeholders to meetings and follow-up</li> <li>Soliciting stakeholder input into the E&amp;S safeguard strategies,</li> </ul>                               | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women's Groups Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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; Trades Union; Drivers/Riders Union, | <ul style="list-style-type: none"> <li>MoF</li> <li>MSL</li> </ul> |
|               | Discussion on specific reforms to implement specific components of projects | <ul style="list-style-type: none"> <li>Radio and Television Discussion and Phone-in Programs</li> <li>Formal and informal meetings</li> </ul> | <ul style="list-style-type: none"> <li>Enable stakeholders to speak freely about project related issues</li> <li>Enhance stakeholder understanding and support for project initiatives</li> </ul>          | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women's Groups Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; World Bank Group; CSOs/NGOs/Media; Vulnerable groups; Ward/Village Development Committees;   | <ul style="list-style-type: none"> <li>MoF</li> <li>BSL</li> </ul> |

| Project Stage | Topic of consultation  | Engagement Technique  | Application of the technique   | Target Stakeholders   | Responsibility   |
|---------------|--|---|--|---|--|
|               |  |   |  | Councillors; Women Groups/Associations; Persons with Disability; Other Specialized NGOs to address project related issues; The Businesses Community; Community/religious leaders; Trades Union; Drivers/Riders Union,   |  |
|               | Guidelines for compensation to affected individuals and households | <ul style="list-style-type: none"> <li>• Meetings</li> <li>• radio/TV discussions,</li> <li>• engagement with affected individuals and household, community leaders etc.</li> </ul> | <ul style="list-style-type: none"> <li>• Dissemination of information to mass audiences</li> <li>• Solicit inputs into guidelines for social and financial support to affected households</li> </ul>   | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women's Groups Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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; Trades Union; Drivers/Riders Union, | <ul style="list-style-type: none"> <li>• MoF</li> <li>• BSL</li> </ul> |
|               | Labor and working conditions associated with project activities    | <ul style="list-style-type: none"> <li>• Formal and informal meetings</li> </ul>  | <ul style="list-style-type: none"> <li>• Present information on employees contracts</li> <li>• Display information on notice boards, sign posts, radio announcement etc.</li> <li>• Encourage the use of GRM mechanism to address issues on labour and working conditions</li> </ul> | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women's Groups Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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;  | <ul style="list-style-type: none"> <li>• MoF</li> <li>• BSL</li> </ul> |

| Project Stage   | Topic of consultation  | Engagement Technique   | Application of the technique   | Target Stakeholders   | Responsibility   |
|-----------------|--|--|--|---|--|
|                 |  |  |  | Community/religious leaders; Trades Union; Drivers/Riders Union,  |  |
| Project Closure | Lessons Learning Sessions  | <ul style="list-style-type: none"> <li>Public online surveys</li> <li>Focus group meetings</li> <li>Expert one-on-one interviews</li> <li>Formal meetings</li> </ul> | <ul style="list-style-type: none"> <li>Present Project information to a large group of stakeholders, especially communities</li> <li>Allow stakeholders to provide their views and opinions</li> <li>Distribute technical and non-technical information</li> <li>Record discussions, comments, questions.</li> </ul> | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women's Groups Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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; Trades Union; Drivers/Riders Union, | <ul style="list-style-type: none"> <li>MoF</li> <li>BSL</li> </ul> |
|                 | <ul style="list-style-type: none"> <li>Sustainability</li> </ul> | <ul style="list-style-type: none"> <li>Public online surveys</li> <li>Focus group meetings</li> <li>Expert one-on-one interviews</li> <li>Formal meetings</li> </ul> | <ul style="list-style-type: none"> <li>Present Project information to a large group of stakeholders, especially communities</li> <li>Allow stakeholders to provide their views and opinions</li> <li>Distribute technical and non-technical information</li> <li>Record discussions, comments, questions.</li> </ul> | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women's Groups Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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; Trades Union; Drivers/Riders Union, | <ul style="list-style-type: none"> <li>MoF</li> <li>BSL</li> </ul> |
|                 | <ul style="list-style-type: none"> <li>Project Assets</li> </ul> | <ul style="list-style-type: none"> <li>Expert one-on-one interviews</li> </ul>   | <ul style="list-style-type: none"> <li>Present Project information to a large</li> </ul>   | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex  | <ul style="list-style-type: none"> <li>MoF</li> <li>BSL</li> </ul> |



| Project Stage | Topic of consultation | Engagement Technique  | Application of the technique  | Target Stakeholders   | Responsibility |
|---------------|-----------------------|---|---|---|----------------|
|               |                       | <ul style="list-style-type: none"> <li>Formal meetings</li> </ul> | <p>group of stakeholders, especially communities</p> <ul style="list-style-type: none"> <li>Allow stakeholders to provide their views and opinions</li> <li>Distribute technical and non-technical information</li> <li>Record discussions, comments, questions.</li> </ul> | <p>Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women's Groups Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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; Trades Union; Drivers/Riders Union,</p> |                |

### 3.5 Stakeholder Engagement Strategy

The PIU 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 financial inclusion | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women’s Groups<br>Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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/religious leaders; Trades Union; Drivers/Riders Union, | Discuss and agree on priority needs and requirements for effective delivery of financial inclusion | Offices of MDAs, LCs, Various Wards, Communities , offices of CSOs/CBOs/ NGOs | MoF<br>BSL       |
| Develop Plan for the delivery of financial inclusion         | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women’s Groups<br>Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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/religious leaders; Trades Union; Drivers/Riders Union, | Discussion on the priority needed in delivering financial inclusion                                | Offices of MDAs, LCs, Various Wards, Communities , offices of CSOs/CBOs/ NGOs | MoF<br>BSL       |
| Reforms and strategies for effective financial inclusion     | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women’s Groups<br>Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; World Bank Group; CSOs/NGOs/Media;  | Discuss the reforms; Needed for effective financial inclusion                                      | Offices of MDAs, LCs, Various Wards, Communities , offices of                 | MoF<br>BSL       |

| Key Project Preparation Advance (PPA) Activities  | Target Stakeholders   | Expected discussions and decisions   | Locations  | Responsibilities |
|---|---|--|--|------------------|
|   | 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/religious leaders; Trades Union; Drivers/Riders Union,  |  | CSOs/CBOs/NGOs   |                  |
| Capacity Development Plan /tools to roll out interventions.   | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women’s Groups<br>Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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/religious leaders; Trades Union; Drivers/Riders Union, | Capacity needs, available capacity and capacity gaps for financial inclusion | Offices of MDAs, LCs, Various Wards, Communities , offices of CSOs/CBOs/NGOs | MoF<br>BSL       |
| Development of Environmental and social risk assessments and mitigation plans (ESIAs, ESCP, SEP, GBV Action Plan, Labor Management Procedure, etc.) | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women’s Groups<br>Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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/religious leaders; Trades Union; Drivers/Riders Union, | Environmental and social risk assessments and mitigation                     | Offices of MDAs, LCs, Various Wards, Communities , offices of CSOs/CBOs/NGOs | BSL<br>Paul      |
| Disclosure of Environmental and social risk   | Bank of Sierra Leone, Ministry of Finance, National Revenue Authority, Ecobank MF, SALPOST, Apex Bank, BRAC Microfinance  | Environmental and social risk  | Offices of MDAs, LCs, Various  | MoF<br>BSL       |

| Key Project Preparation Advance (PPA) Activities | Target Stakeholders   | Expected discussions and decisions | Locations                                     | Responsibilities |
|--|---|------------------------------------|---|------------------|
| management plans                                 | limited, SME Association, Leasing Companies, Financial Intelligence Unit (FIU), UNCDF, Women's Groups Ministry of Social Welfare, Gender and Children's Affairs (MSWGCA), UN Women, World Bank; 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/religious leaders; Trades Union; Drivers/Riders Union, | management plans                   | Wards, Communities, offices of CSOs/CBOs/NGOs |                  |

### 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"> <li>• Officials at MoF</li> <li>• PIU</li> <li>• Banks</li> <li>• MFIs</li> <li>• LCs</li> <li>• Development partners</li> <li>• World Bank Group</li> <li>• PAPs</li> </ul> | <ul style="list-style-type: none"> <li>• ESMF</li> <li>• SEP</li> <li>• GRM</li> <li>• LMP</li> </ul> | <ul style="list-style-type: none"> <li>• News paper</li> <li>• Website</li> <li>• Online and ICT enabled</li> <li>• Radio</li> <li>• Town Hall Meetings</li> </ul> | One month after project effectiveness<br>Throughout project implementation |

| Project stage | Target stakeholders   | List of information to be disclosed   | Methods   | Timing proposed  |
|---------------|---|---|---|--|
|               | <ul style="list-style-type: none"> <li>• General Public</li> <li>• Traders Association</li> </ul>   |   |   |  |
|               | <ul style="list-style-type: none"> <li>• Banks</li> <li>• MFIs</li> <li>• The public</li> <li>• Impacted Communities,</li> <li>• Traders Association</li> <li>• Traders/Market women</li> <li>• Transport operators and commuters</li> <li>• SMEs</li> </ul>  | <ul style="list-style-type: none"> <li>• Detailed project information (Beneficiary LCs, likely impact of project, etc.)</li> <li>• ESMF, ESMP, SEP, GRM</li> </ul>          | <ul style="list-style-type: none"> <li>• Radio and phone in interaction with public</li> <li>• Television</li> <li>• Social media</li> <li>• News paper</li> <li>• Posters and brochures</li> </ul> | <ul style="list-style-type: none"> <li>• Before project implementation is started</li> </ul> |
|               | <p>Vulnerable Groups:</p> <ul style="list-style-type: none"> <li>• Residents in slums or informal settlements and flood-prone or inaccessible areas.</li> <li>• Physically challenged persons with visual and hearing impairment</li> <li>• Women, girls, poor and disadvantaged children pregnant school age girls</li> <li>• Ebola/COVID-19 Survivors</li> <li>• Stakeholders in high illiterate areas</li> </ul> | <ul style="list-style-type: none"> <li>• ESMF, ESMP, LMP, SEP, GRM and other relevant project documentation.</li> <li>• Project information and progress updates</li> </ul> | <ul style="list-style-type: none"> <li>• Engagement with specialized agencies dealing with these stakeholders to employ the most appropriate means of engagement.</li> </ul>                        | <ul style="list-style-type: none"> <li>• Throughout project implementation</li> </ul>        |

## **4.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES**

### **4.1. Resources**

The implementation of this SEP will be integrated into the implementation of the various components of the project to ensure stakeholders are engaged in all phases of the Program. An estimated funding of US\$ **565,000.00** has been allocated for the SEP implementation as part of the overall IPF component cost, which would fund all multi-stakeholder engagements at all levels, including the headquarters, regional and district levels. As such, the budget for implementation of stakeholder engagement activities have been fully integrated in the activities' budget. All policy related activities include budgets for stakeholder consultations and engagements. All field-based activities are planned to start with adequate sensitization, awareness creation, and engagement. A proposed budget for the stakeholder engagement activities is outlined in Table 9:

***Table 9: Proposed Budget for the Financial Inclusion Project SEP***

| <b>Proposed Budget Item</b>  | <b>Year 1<br/>(USD)</b> | <b>Year 2<br/>(USD)</b> | <b>Year 3<br/>(USD)</b> | <b>Year 4<br/>(USD)</b> | <b>Year 5<br/>(USD)</b> | <b>Total<br/>(USD)</b> | <b>Cost</b>    |
|--|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|------------------------|----------------|
| Media announcements and commercials/adverts /radio/ TV                                       | 10,000                  | 10,000                  | 10,000                  | 10,000                  | 10,000                  |                        | <b>50,000</b>  |
| Social Media engagement including production of short video                                  | 8,000                   | 8,000                   | 8,000                   | 8,000                   | 8,000                   |                        | <b>40,000</b>  |
| Disclosure of E&S information in widely circulated national news papers                      | 10,000                  | 10,000                  | 10,000                  | 10,000                  | 10,000                  |                        | <b>50,000</b>  |
| Project IE&C materials, e.g., leaflets, brochures, fact sheets, newsletters, brail materials | 10,000                  | 10,000                  | 10,000                  | 10,000                  | 10,000                  |                        | <b>50,000</b>  |
| Feedback and Suggestion Box  | 5,000                   | -                       | -                       | -                       | -                       |                        | <b>5,000</b>   |
| Surveys, interviews and independent evaluation   | -                       | 20,000                  | -                       | -                       | 20,000                  |                        | <b>40,000</b>  |
| Community / townhall/ public meeting   | 20,000                  | 20,000                  | 20,000                  | 10,000                  | 10,000                  |                        | <b>80,000</b>  |
| Workshops  | 20,000                  | 20,000                  | 20,000                  | 20,000                  | 20,000                  |                        | <b>100,000</b> |
| Focus group meetings   | 10,000                  | 10,000                  | 10,000                  | 10,000                  | 10,000                  |                        | <b>50,000</b>  |
| Grievance Redress with dedicated hot line and short code                                     | 10,000                  | 10,000                  | 10,000                  | 10,000                  | 10,000                  |                        | <b>50,000</b>  |
| Monitoring   | 10,000                  | 10,000                  | 10,000                  | 10,000                  | 10,000                  |                        | <b>50,000</b>  |
| <b>TOTAL</b>   | <b>113,000</b>          | <b>128,000</b>          | <b>108,000</b>          | <b>98,000</b>           | <b>118,000</b>          |                        | <b>565,000</b> |

#### **4.2. Management Functions and Responsibilities**

The Ministry of Finance will provide overall oversight for the implementation of the stakeholder engagement activities. The BSL will coordinate the establishment of the PIU that will be responsible for the implementation of project activities. A Social Safeguards Specialist will be recruited to work at the PIU. He/She shall be responsible for stakeholder consultation, ensuring that reports and other project information are disclosed appropriately and timeously. He/She will also monitor and report on the implementation of the SEP and ensure compliance with World Bank ESS10 and other relevant Sierra Leonean laws. He/She will also act as the focal person for grievances related to the project. Third party consultants will undertake external monitoring and evaluation of the SEP.

## **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 PIU 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 Financial Inclusion 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***

| <b>GRM stages</b>   | <b>Description of tasks</b>   | <b>Responsibility</b>   | <b>Timeline</b>                           |
|---|---|---|---|
| Assign Focal Persons  | The Social Safeguards Specialist liaise with stakeholders to identify Focal Persons to manage the designated grievance call/documentation centers.  | Social Safeguards Specialist<br>GBV Specialist<br>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<br>GBV Specialist<br>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 establish the eligibility of the complaint, and hence determine its gravity (classified in terms of high, medium, and low severity   | Social Safeguards Specialist<br>GBV Specialist                                  | Ongoing<br>2 working days                 |

| GRM stages   | Description of tasks   | Responsibility  | Timeline  |
|--|--|---|---|
|  |  | Community Outreach Specialist                                 |   |
| 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<br>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<br>Focal Person<br>GRM Committee | Ongoing<br><br>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<br>Focal Person<br>GRM Committee | Ongoing<br><br>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 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 | Social Safeguards Specialist<br>Focal Person<br>GRM Committee | Ongoing   |

| GRM stages   | Description of tasks  | Responsibility | Timeline |
|--|---|----------------|----------|
|  | 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  |

**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  |
| BSL                         | Provides technical guidance and direction in resolving grievances   |
| 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  |
| PIU                         | 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                                   |
| Traders Association         | Mouthpiece of traders in raising grievances for redress   |

**5.5 Worker GRM**

Workers hired by the project 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 employers 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 employers 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 employer must examine all grievances pursuant to its pre-established grievance procedure.
- Any worker filing a grievance must receive notice of the employer's findings regarding his or her particular complaint and whether corrective action will be taken.

### **5.6 Grievance Redress Mechanisms for SEA/SH/ GBV Survivors**

The GRM for the Financial Inclusion Project will embed in its systems to gather and refer GBV and Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) 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 as per the Sierra Leone Referral Protocol. The team will identify partners that can ethically manage a GBV-GRM. The partners will include managers of Government One Stop GBV Centers in regional capitals namely Port Lokko, Kabala, Kailahum, Moyamba, Pujehum and Kingherman Road in Freetown, Rainbo Centres in Freetown, Bo, Kenema, Makeni and Kono as well as various personnel from Family Support Units (FSUs) at attached to various Police Stations in nationwide. Non-state actors such as Women Opinion Leaders in communities (Mummy Queens) who can serve as champions and/or focal points for SEA/SH/GBV sensitization and uptake points for cases will also be engaged.

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/SH. 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 cover SEA/SH).

## **6.0 MONITORING, EVALUATION AND REPORTING**

A project monitoring and evaluation system will operate within the PIU 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 agencies. The M&E Specialist at the PIU will be responsible for collating the data from the implementing agencies and provide quality assurance to the overall reporting processes.

The project M&E plan 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 the implementing agencies 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 PIU, Implementing Agencies, Affected parties, 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 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 |
|--|--|-----------|----------------------------|---|------------------------------------|
| <b>Goal:</b>   |  |           |                            |   |                                    |
| To facilitate the financial inclusion of individuals and micro, small and medium sized enterprises (MSMEs) | This measures the extent to which MSMEs are happy with the financial inclusion products and services | Annual    | Annual survey              | Conduct stakeholder satisfaction survey on implementation of project                        | PIU                                |
| <b>Outcomes:</b>   |  |           |                            |   |                                    |
| 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   | PIU                                |
| Stakeholders satisfied with project activities/outputs   | This measures the extent to which key stakeholders are satisfied with project activities.            | Bi-annual | Bi-annual reports          | Conduct bi-annual stakeholder satisfaction survey on project activities in their localities | PIU                                |
| 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  | PIU                                |
| <b>Outputs:</b>  |  |           |                            |   |                                    |

| Indicator Name   | Definition/Description   | Frequency  | Data source                            | Methodology for Data Collection | Responsibility for Data Collection |
|--|--|------------|--|---------------------------------|------------------------------------|
| 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 PIU | PIU                                |
| 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 PIU | PIU                                |
| 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 PIU | PIU                                |
| Key project information disclosed                          | This measures the number and type of project information disclosed   | Monthly    | SEP, reports on information disclosure | Review project documents at PIU | PIU                                |
| 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<br>ESCP                            | Review project documents at PIU | PIU                                |
| Grievances recorded  | This measures the number and types of grievances recorded as a result of project activities                      | Monthly    | GRM reports<br>E&S reports             | Review project documents at PIU | PIU                                |
| Grievances resolved  | This measures the number and types of grievances resolved as a result of project activities                      |            | GRM reports<br>E&S reports             | Review project documents at PIU | PIU                                |