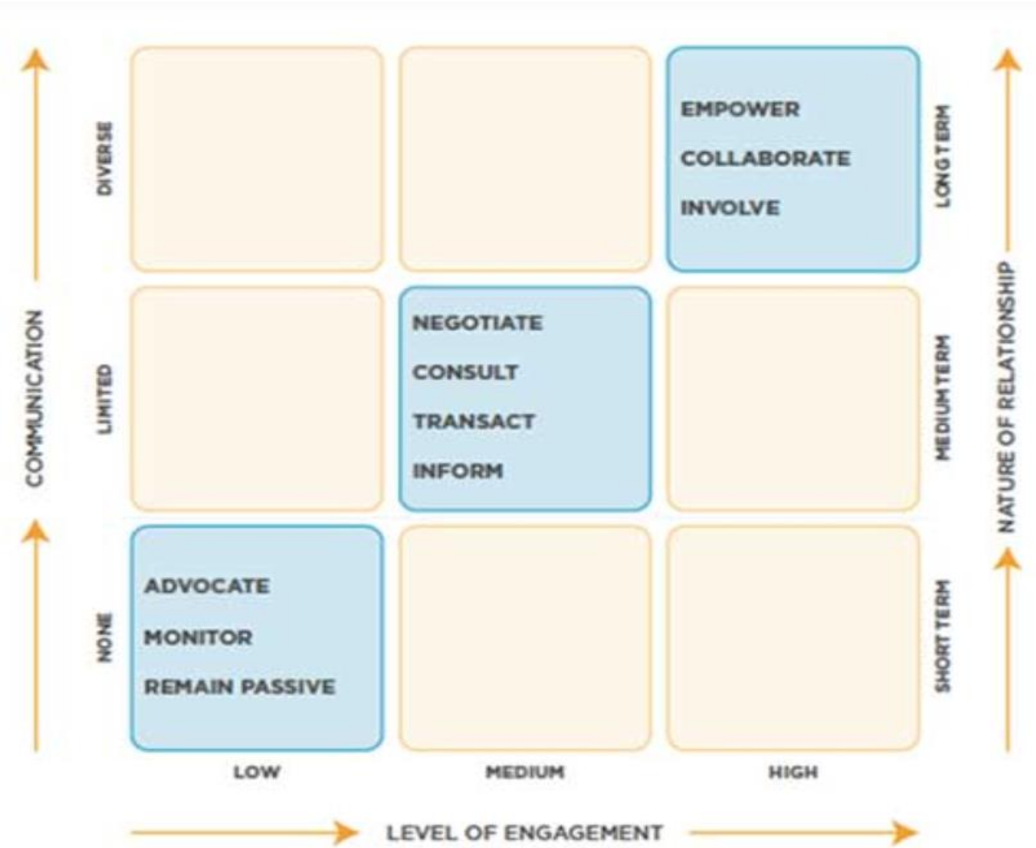
STAKEHOLDER ENGAGEMENT PLAN

FOR

NIGERIA COVID-19 ACTION RECOVERY AND ECONOMIC STIMULUS (P174114)



October 2020

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CARES	Covid-19 Action Recovery and Economic Stimulus
AoI	Area of Influence
CDA	Community Development Association
CCT	Conditional Cash Transfers
CSOs	Civil Society Organizations
CSDA	Community and Social Development Agency
CLO	Community Liaison Officer
DLI	Disbursement-linked indicator
DLR	Disbursement-linked results
ES	Executive Summary
ESS	Environmental and Social Standards
ESF	Environmental and Social Framework
FGD	Focus Group Discussions
FPIC	Free Prior Informed Consent
GEEP	Government Enterprise and Empowerment Programme
GRM	Grievance Redress Mechanism
GO	Grievance Officer
IDP	Internally Displaced Person
IVA	Independent Verification Agent
LGA	Local Government Area
LRP	Livelihood Restoration Plan
MDAs	Ministries, Departments and Agencies
MPA	Multi-phase Programmatic Approach
FMWASD	Federal Ministry of Women Affairs & Social Development
NGO	Non-Governmental Organization
PAF	Project Affected Families
PAP	Project Affected Person
PDO	Project Development Objective
PID	Project Identification Document
PfoR	Program for Result
VDC	Village Development Committee
WBG	World Bank Group
WDR	World Development Report
YESSO	Youth Employment and Social Support Operation

EXECUTIVE SUMMARY

The World Bank is supporting the Federal Government of Nigeria through the Nigeria Covid-19 Action Recovery and Economic Stimulus (CARES) Program for Result PforR operation. The operation is a new state-level PforR defined around a national Program of Expenditures to support the mitigation and economic recovery efforts of States over the next 18 months to 24 months.

For the effective implementation of the Nigeria CARES program including the activities listed under result area 4, there is need for open and inclusive engagements/dialogues with stakeholders, Project Affected Persons (PAPs), and other interested parties. Stakeholder engagement is a critical process that identifies the procedures for the proponent to identify, communicate and engage with people affected by its decision and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It is an inclusive process that is required throughout the lifecycle of project implementation, commencing as early as possible. Participatory approaches in project planning and implementation enhance project policy, ownership, sustainability and also empowers targeted beneficiaries.

The Project Development Objective (PDO) is to **protect livelihoods and food security of poor and vulnerable families and facilitate recovery of economic activities in all participating states in Nigeria.**

Specific objectives of this SEP are;

- To develop the procedure for effective stakeholder engagements throughout the Project's lifecycle;
- To identify the key stakeholder groups; and
- To identify resources needed and timeframe to achieve effective participation in each stage of the process and describes the stakeholder engagement process.

Applicable *National Legal Provisions* and Regulations for Environmental and Social Safeguards and Citizen Engagement include; Constitution of the Federal Republic of Nigeria (1999) as amended, The Freedom of Information Act (2011), Nigerian Environmental Impact Assessment (EIA) Act Cap E12, LFN 2004, The Nigerian Urban and Regional Planning Act, Cap N138, 2004.

Applicable *World Bank Policies include;* The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10.

The level of success and sustainability of the CARES projects is crucial and dependent upon proper **Stakeholder Engagement** and its associated activities taking place.

For the purposes of effective and tailored engagement, the stakeholders of CARES can be divided into three core categories:

1. Implementing Agencies (e.g., MDAs)
2. Affected Parties (Beneficiaries, PAPs, etc.)
3. Interested Parties (local population who can benefit indirectly, etc.)

In keeping with the applicable reference framework and the expectations of the stakeholders, the project will undertake regular engagement with the key stakeholder groups identified; through the life of the project utilizing various engagement methods identified for the purpose of this project such as; Focus Group Discussions, Semi-structured and Structured Interviews and Questionnaires, Open Public Meetings, Information Disclosure.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within the CARES PMU.

In compliance with applicable local and national laws and essentially the World Bank's OP 4.01, a project-specific mechanism is being set up to handle complaints and issues. This process (referred to as the Grievance Redress Mechanism) would be specially designed to collect, collate, review and redress stakeholders' concerns, complaints and grievances. The GRM will be accessible and understandable for all stakeholders in the project and for the entire project life.

Monitoring and evaluation of the stakeholder process is considered vital to ensure the CARES can respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. A series of key performance indicators for each stakeholder engagement stage have been developed and outlined in Table 7.1

CHAPTER ONE: INTRODUCTION

1.1 Background Information

The World Bank is supporting the Federal Government of Nigeria through the Nigeria Covid-19 Action Recovery and Economic Stimulus (CARES) Program for Result PforR operation. The operation is a new state-level PforR defined around a national Program of Expenditures to support the mitigation and economic recovery efforts of States over the next 18 months to 24 months.

For the effective implementation of the Nigeria CARES program including the activities listed under result area 4, there is need for open and inclusive engagements/dialogues with stakeholders, Project Affected Persons (PAPs), and other interested parties. Stakeholder engagement is a critical process that identifies the procedures for the proponent to identify, communicate and engage with people affected by its decision and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It is an inclusive process that is required throughout the lifecycle of project implementation, commencing as early as possible. Participatory approaches in project planning and implementation enhance project policy, ownership, sustainability and also empowers targeted beneficiaries.

This SEP is designed to fulfil the project's requirements as stated in ESS10 of the ESF. Its goal is to promote and support inclusive and transparent participation of all stakeholders in the design and implementation of the CARES. Where properly designed and implemented, stakeholder engagement supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

The Stakeholder Engagement Plan (SEP) describes the methods of engagement with stakeholders throughout the lifecycle of the project. It identifies information and types of interaction to be conducted in each phase of the project, considers and addresses stakeholders' communication and physical accessibility challenges, and includes any other stakeholder engagement required.

The Stakeholder Engagement will involve the following steps:

- stakeholder identification and analysis;
- proper documentation of all stakeholders' plans on how the engagement with stakeholder will take place;
- disclosure of information;
- consultation with stakeholders;
- addressing and responding to grievances, and
- Reporting to stakeholders.

1.2 Purpose of the Project

The **project development objective** is to **protect livelihoods and food security of poor and vulnerable families and facilitate recovery of economic activities in all participating states in Nigeria.** The proposed intervention is dedicated to State Governments' budget program of expenditures in intervention – targeting existing and newly identified vulnerable/poor households, their food supply chain and micro and small enterprise affected by COVID-19.

1.3 Objectives of the Stakeholder Engagement Plan

The objective of the Stakeholder Engagement Plan is:

- To develop the procedure for effective stakeholder engagements throughout the Project's life cycle.
- To identify the key stakeholder groups; and
- To identify resources needed and timeframe to achieve effective participation in each stage of the process and describes the stakeholder engagement process.

1.4 Project Components[1]

Within this framework, the project is structured around four components:
The program by design is structured to be flexible, fast disbursing along the following 4 result areas.

Result Area 1. Increased Social Transfer, Basic services and livelihood support to poor and vulnerable households. This result area is disaggregated around the following activities:

- Social Transfer to aged, Physically Challenged, chronically ill and urban poor
- Livelihood grants to economically active household members
- Labour intensive public work activities
- Community and group investment/basic infrastructure services

Result Area 2. Increased food security and safe functioning of food supply chain. This will include agriculture related activities across the entire Agriculture value chain such as:

- Provision of agricultural inputs and services
- Labour intensive agricultural infrastructures
- Agricultural assets for production and mitigation of food loss and waste
- Upgrading wet markets to function safely

Result Area 3. Facilitating Recovery and Enhancing Capabilities of MSEs. Activities proposed under this result area include

- Provision of well targeted conditional grants to co-finance loans that eligible MSEs received during the COVID-19.
- Extending conditional grants to MSEs cover up 50% portion of monthly operation cost of MSEs.

[1] These components reflect the project components on which stakeholders were consulted at the time. Slight modifications have since been made to components.

- Support adoption of digital payments integration and IT connection cost of MSEs

Result Area 4. Strengthened Institutional Support for State Coordination and Delivery. While implementation of result areas 1-3 will happen at the state level, result area 4 will be implemented at the federal level and will include

- Verification of result through an independent verification agent;
- Financial management service and technical support;
- Monitoring and evaluation and
- Peer learning experience sharing.

Result Area 1

- **Increased Social Transfer, Basic services and livelihood support to poor and vulnerable households**
- **1.1:** Social Transfer to aged, Physically Challenged, chronically ill and urban poor
- **1.2:** Livelihood grants to economically active household members
- Labour intensive public work activities
- Community and group investment/basic infrastructure services.

Result Area 2

- **Increased food security and safe functioning of food supply chain**
- **2.1.** Provision of agricultural inputs and services
- **2.2.** Labour intensive agricultural infrastructures
- **2.3** Agricultural assets for production and mitigation of food loss and waste
- 2.4. Upgrading wet markets to function safely.

Result Area 3

- **Facilitating Recovery and Enhancing Capabilities of MSEs**
- **3.1:** Provision of well targeted conditional grants to co-finance loans that eligible MSEs received during the COVID-19.
- **3.2:** Extending conditional grants to MSEs cover up 50% portion of monthly operation cost of MSEs.
- **3.3:** Support adoption of digital payments integration and IT connection cost of MSEs

Result Area 4

- **Strengthened Institutional Support for State Coordination and Delivery.**
- **4.1**: Verification of result through an independent verification agent;
- **4.2:** Financial management service and technical support;
- **4.3**: Monitoring and evaluation and
- **4.4**: Peer learning experience sharing.

Figure 1.1: Program Components

1.5 Stakeholder Engagement to date and Key Feedback received during Stakeholder Consultations

- The ministries, institutions and participating implementing agencies at the federal and state levels were consulted to inform them about the project. World Bank ESF and general safeguard concerns that need to be mainstreamed into the project. Their support to the project was also solicited along with a discussion on needs and capacities. Subsequently, a virtual stakeholder workshop was held on the 2nd September 2020, where stakeholders from the existing implementing agencies in the result areas (Community and Social Development Agency (CSDA), FADAMA, Youth Employment and Social Support Operation (YESSO) and Government Enterprise and Empowerment Programme (GEEP)) were convened to discuss and make further inputs on the instruments of the project like the Stakeholders Engagement Plan, and the Labour Management Procedures.

1.6 Principles for effective stakeholder engagement

The project's Stakeholder Engagement Plan (SEP) shall be informed by a set of principles defining its core values underpinning interactions with identified stakeholders. Common principles based on "International Best Practice" include the following:

- **Commitment** is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process;
- **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognized;
- **Transparency** is demonstrated when community concerns are responded to in a timely, open and effective manner;
- **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- **Trust** is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

The process flow for stakeholder engagement indicated in Figure 1.2 is represented as a circle because it is constant, where lessons from past experience will then shape future planning and engagement. The process is not linear; rather it is an iterative process in which an organisation learns and improves its ability to perform meaningful stakeholder engagement while developing relationships of mutual respect, in place of one-off consultations.

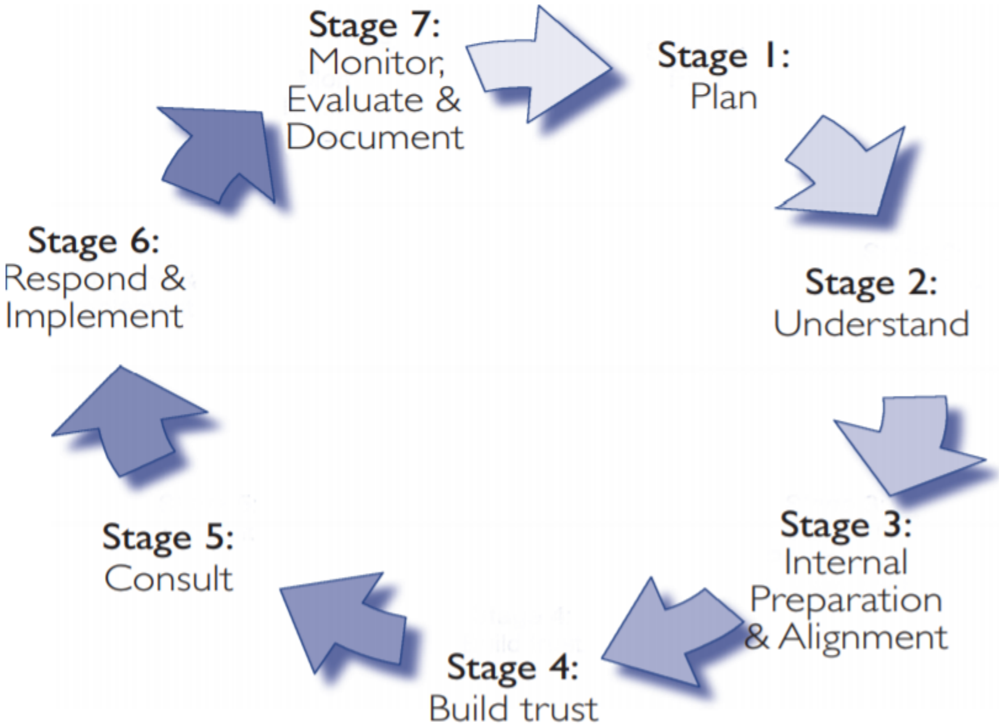

Figure 1.2: The Process Flow of Stakeholder Engagement

1.7. Structure of Stakeholder Engagement Plan

The structure of the stakeholder engagement plan will be as follows;

- Introduction
- Stakeholder Engagement Regulatory Context
- Stakeholder Identification and analysis
- Stakeholder Engagement Program
- Resources and responsibilities
- Grievance Redress Mechanism
- Monitoring and Reporting

CHAPTER TWO: STAKEHOLDER ENGAGEMENT REGULATORY CONTEXT

2.0 Stakeholder Engagement Regulatory Context

This section presents a brief overview of the national legal provisions that necessitates citizenship engagement, disclosure of public information and adequate response to queries, concerns and grievances raised by the public on key government actions.

2.1 Key National Legal Provisions for Environmental and Social Safeguards and Citizen Engagement

2.1.1 The Freedom of Information Act

The purpose of the Act is to make public records and information more freely available, provide for public access to public records and information, protect public records and information to the extent consistent with the public interest and the protection of personal privacy, protect serving public officers from adverse consequences for disclosing certain kinds of official information without authorization and establish procedures for the achievement of those objectives. This Act applies not only to public institutions but also to private organisations providing public services, performing public functions or utilising public funds. According to the Act,

- All stakeholders are entitled to access to any records under the control of the government or public institution
- Any stakeholder denied information can initiate a court proceeding to affect the release of such information
- All public institutions shall make available any records as requested by the stakeholders within a period of 7 days

2.1.2 Constitution of the Federal Republic

Chapter two of the Nigerian constitution takes socioeconomic rights of Nigerians into account. This chapter includes that no citizen should be denied the right to environment, the right to secure and adequate means of livelihood, right to suitable and adequate shelter, the right to suitable and adequate food, etc. Section 20 of the constitution also takes into account the use of resources and provides that the environment must be protected and natural resource like water, air, and land, forest and wildlife be safeguarded for the benefit of all stakeholders.

2.1.4 Nigerian Environmental Assessment Law

This act provides guidelines for activities for which EIA is compulsory (such as mining operations, road development, coastal reclamation involving 50 or more hectares, etc.). It prescribes the procedure for conducting and reporting EIAs and dictates the general principles of an EIA. The EIA act enshrines that consideration must be given to all stakeholders before the commencement of any public or private project by providing for the involvement and input of all stakeholders affected by a proposed project.

2.1.5 Other Legal Provisions on Stakeholder Engagement and Disclosure

The Nigerian Urban and Regional Planning Act, Cap N138, 2004 provides that any land development plan must be disclosed to stakeholders to prove that such projects would not harm the environment or constitute nuisance to the community.

2.2 World Bank Environmental and Social Standard on Stakeholder Engagement

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts;
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation;
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).

A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100).

For more details on the WB Environmental and Social Standards, please follow the link below: https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards

CHAPTER THREE: STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.0 Project Stakeholder identification and Analysis

Project stakeholders are 'people who have a role in the Project, or could be affected by the Project, or who are interested in the Project'. Project stakeholders can further be categorized as primary and secondary stakeholders. Primary stakeholders are individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly, especially those who are directly affected, including those who are disadvantaged or vulnerable. Secondary stakeholders are broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them.

Thus, the CARES Project stakeholders are defined as individuals, groups or other entities who:

(i) Have a role in the project implementation (also known as 'implementing agencies');
(ii) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
(iii) 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 the Project outcomes in any way.

3.1 Stakeholder Categorization

For the purposes of effective and tailored engagement, the stakeholders of CARES can be divided into three core categories:

1. Implementing Agencies
2. Affected Parties
3. Interested Parties

3.1.1 Implementing Agencies

This category of stakeholders encompasses the leading agencies responsible for overseeing the successful implementation of the CARES program. They include the:

- Federal Ministry of Finance (FMoF);
- Federal Cares Program Support Unit
- State CARES Coordination Unit
- Community and Social Development Agency (CSDA)
- State Cash Transfer Units
- YESSO
- State FADAMA or Agriculture Development Agencies
- MSE Unit/Ministry of Commerce and GEEP
- State Jobs Creation Units/SME Agency
- Federal Ministry of Women Affairs and Social Development (FMWSD)

- Technical Working Group (TWG) on Social Development, Ministry of Labour and Productivity
- The EA Department of the Federal Ministry of Environment

The level of engagement with implementing agency will be contingent upon their respective roles and authorities in the management of environmental and social risks

In order to meet best practice approaches, CARES Program implementing agencies will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach*: Public consultations for the program(s) 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*: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analysing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the program is inclusive. All stakeholders at all times are encouraged to 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. Special attention is given to vulnerable groups identified by the program which include the rural population, people living with disabilities, women, and disadvantaged youth.

3.1.2 Affected Parties

Specifically,

- The poor
- The vulnerable
- Production/cluster groups and federated production associations.
- Investors/Off-takers/Processors
- COVID-19 impacted labor-sufficient households,
- COVID-19 impacted labor-deficit households and those in their communities
- Survivalists: enterprises with fewer capabilities, productive assets and negligible firm to market relationships;
- Constrained but motivated: enterprises with productive capabilities and meaningful firm to market relationships; and
- Growth-Oriented – resilient - top-performers: enterprises with transformative capabilities and firm-employee, and buyer-supplier relationships.

There could also be impacts on indirect workers who will be engaged under the program activities. Some detailed criteria for the affected persons and family are indicated in Annex 2.

A subset of this category are the vulnerable groups. A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the program. Vulnerable Groups are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable [2]status, and that may require special engagement efforts to ensure their equal representation in the consultation and participation in the program.

The vulnerable groups identified by the project include but not limited to:

- People Living with Disabilities (PLWDs (varied types of disability – beyond physical)
- Refugees
- Internally Displaced Persons (IDPs)
- Separated and unaccompanied girls associated with displaced people
- IDP students
- Girls who are survivors of violence
- trafficked victims
- Child-headed households
- Single mother headed households
- Widowed mothers
- older persons
- orphans, and other [3]Persons of Concern

3.1.3. Interested Parties

Interested Parties include stakeholders who 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 influence the project and the process of its implementation in some way. Specifically, this category will include the following individuals and groups:

- Community leaders who are involved in community-based targeting and validation
- The local population who can benefit indirectly from interventions
- Residents and business entities, and individual entrepreneurs in the community area of the project that can benefit from the social investment strategies and skills program
- Local contractors and consultants who can support in the delivery of the Project
- Local, regional and national level civil societies and non-governmental organizations (NGOs) with an interest in Social Protection and livelihood support
- Other government ministries and regulatory agencies at regional and national levels including environmental, technical, social development and labour authorities

[2] Vulnerable status may stem from an individual's or group's ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on other individuals or unique natural resources.

[3] A person of concern is any person whom the United Nations High Commissioner on Refugees (UNHCR), the UN Refugee Agency, considers a refugee, internally displaced person (IDP), asylum- seeker, or stateless person, with some additional persons not fitting these criteria.

- CARES project employees and contractors
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations
- Local Political groups.

Local NGOs and initiative/advocacy groups, particularly those focusing on social development issues, represent considerable capacity that the project may tap for disseminating information and raising awareness of the planned activities among the potentially affected communities in the project area. NGOs typically have well established interaction with the local communities, are able to propose the most effective and culturally appropriate methods of liaising based on the local customary norms and prevailing means of communication and possess the facilitation skills that may be utilized as part of the program's consultations. In addition, NGOs may lend assistance in disseminating information about the proposed program to the local communities, including in the remote areas (e.g., by placing information materials about the program in their offices, distributing the project information lists during events that they are organizing), and provide venues for the engagement activities such as focus-group discussions. Table 3.1 provides an initial profile of the various stakeholders identified, within the Result Areas.

Table 3.1: Stakeholder Profiles/ Categorization

Stakeholder Group	Profile of the Stakeholder Group	Relevant Result Area
Project Affected Persons/family (PAPs/PAFs)	•This stakeholder group comprises of The– Poor as defined in annex 2 and the national social register for the poor and vulnerable in each state. COVID-19 Impacted Labor-Sufficient Households, COVID-19 Impacted Labor-Deficit Households and Those in Their Communities Survivalists: Enterprises with Fewer Capabilities, Productive Assets and Negligible Firm to Market Relationships; Constrained but Motivated: Enterprises with Productive Capabilities and Meaningful Firm to Market Relationships; And Growth-Oriented – Resilient - Top-Performers: Enterprises with Transformative Capabilities and Firm-Employee, And Buyer-Supplier Relationships. There Could Also Be Impacts On Indirect Workers Who Will Be Engaged Under the Activities.	• This stakeholder group constitutes the most important stakeholder group as beneficiaries of the program in result area 1, 2 and 3
Vulnerable Groups	• People Living with Disabilities (PLWDs (varied types of disability – beyond the physical) • Refugees; • Internally Displaced Persons (IDPs), • Separated and unaccompanied girls associated with displaced people • IDP students • Girls who are survivors of violence. • trafficked victims, • Child-headed households • Single mother headed households • Widowed mothers • orphans, • Those without any potential source of income • Elderly couples / single member households without support.	This stakeholder group constitutes the most important stakeholder group as beneficiaries of the program in result areas 1, 2 and 3
Small-scale enterprises/ businesses	• Production/Cluster Groups and Federated Production Associations. • Investors/Off-takers/Processors	This stakeholder group constitutes the most important stakeholder group as beneficiaries of the program in result area 1, 2 and 3
Local Community Leaders (Traditional & / or Religious) Local Community in AoI	• This stakeholder group is comprised of those individuals in the community who hold traditional power in the communities touched by the Program boundaries, which is not expected to be directly impacted by the Program activities but may be impacted indirectly.	• Important stakeholder group as influencers of the program in result area 1, 2 and 3

Implementation Partners and NGOs/CSOs operating within the program areas	• This stakeholder group is comprised of the third-party livelihood experts who may serve as independent verification agent; and regional, national and international Non-Governmental Organizations (NGOs) and Civil Society Organizations (CSOs) operating in the sphere of agricultures, industry, social safety net, people's development and community development	• Important stakeholder group as influencers of the program in result area 1, 2, 3 and 4
Regulatory Authorities	This group is comprised of the regulatory authorities at the local, State and Federal levels that are responsible for various permits and licenses pertaining to the Program.	Important stakeholder group as influencers of the program in result area 1, 2, 3 and 4
Contractors and other sub-contractors	• This stakeholder group comprises of the contractors/consultants involved in the Program.	• Important interested parties in the program in result area 1, 2 and 3
Program Financing Agencies	• This stakeholder group is comprised of the financing agencies who are exploring an investment opportunity in the Program.	• Important interested parties in the program in result area 1, 2, 3 and 4
Local Government / Community Development Associations Community Leadership / Elders Forum	This stakeholder group is comprised of the government departments and community development association at local levels	Important interested parties in the program in result area 1, 2, 3and 4
MDAs working on Community Development Activities	• This stakeholder group includes those government bodies which are involved in undertaking community development activities such as the cottage industry department, Creative arts and Fashion, Food processing horticulture department, etc.	Important interested parties in the program in result area 1, 2, 3and 4
Local Political Groups	• This stakeholder group is comprised of the political parties and local politicians active in the States and region.	Important interested parties in the program in result area 1, 2, 3and 4
Media	• This stakeholder group is comprised of the local or state, regional and national press (both print and audio-visual). This stakeholder group can play an extremely important role in the generation of awareness and public opinion towards the Program.	Important interested parties in the program in result area 1, 2, 3and 4

CHAPTER FOUR: STAKEHOLDER ENGAGEMENT PLAN (THROUGHOUT PROJECT LIFE-CYCLE)

4.1 Stakeholder Engagement Plan

The goal of the project's Stakeholder Engagement Plan is to promote and provide means for effective, inclusive, accessible and, meaningful engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them during implementation of the various activities listed under the Technical Assistant component of the program result Area 4.

4.2 Engagement Methods and Tools

The project will utilize various methods of engagement through the implementing agencies as part of their continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with Government officials may be different from a format of liaising with the local communities (e.g., focus group discussions, displays and visuals with a lesser emphasis on technical aspects).

The format of every engagement activity will meet general requirements on accessibility, i.e. should be held at venues that are easily reachable and do not require long commute, entrance fee or preliminary access authorization, cultural appropriateness and inclusivity. If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the project.

Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of tailored techniques. The vulnerable groups identified by the program in both rural and urban population include, elderly people, persons living with disabilities, women, and disadvantaged youth. Particular attention will be given to the vulnerable groups to ensure that they are not denied program benefits. This will be done by focus group discussions, monitoring participation rates, undertaking beneficiary assessments, using online platforms to allow access to otherwise disadvantaged groups, and ensuring that at least 30% of participant beneficiaries across the result areas are females.

Information that is communicated in advance of public consultations primarily includes an announcement thereof in the public media—local, regional and national—as well as the distribution of invitations and full details of the forthcoming meeting well in advance, including the agenda. It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the stakeholders. Furthermore, the messages are targeted according to the stakeholder and issues.

There are three important questions to answer when preparing messages as shown in Figure 4.1 and the checklist to follow as shown in Figure 4.2.

Figure 4.1: Important questions for preparing a message

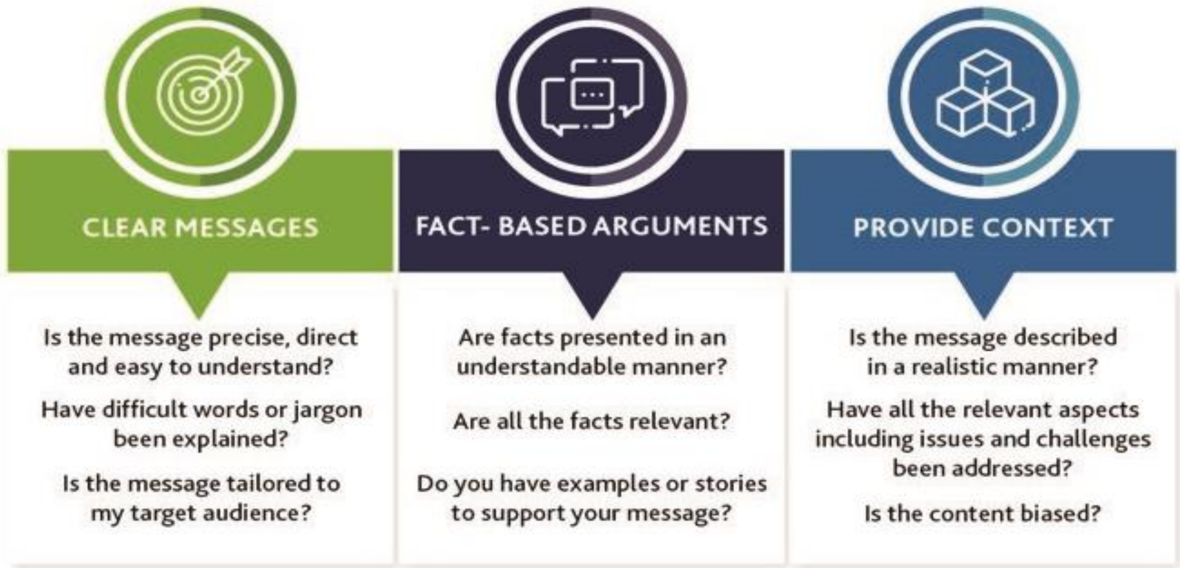

Figure 4.2: Checklist to guide in developing clear messages

The above parameters can be achieved through the following approaches:

Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication. That is, it should be made available via publicly accessible locations and channels. The primary means of notification may include mass media and the dissemination of posters/ advertisements in public places. The project keeps proof of the publication (e.g. a copy of the newspaper announcement) for accountability and reporting purposes. Existing notice boards in the implementing agencies and the community-based platforms may be particularly useful for distributing the announcements. When the notifications are placed on public boards in open air, it should be remembered that the posters are exposed to weather, may be removed by by-passers or covered by other advertisements. The project's staff will therefore maintain regular checks in order to ensure that the notifications provided on the public boards remain in place and legible.

Another critical aspect of the meeting preparation process is selecting the methods of communication that reach the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the project. Oral communication is an option that enables the information to be readily conveyed to such persons. This includes involving the selected stakeholder representatives and institutional leaders to relay up-to-date information on the project and consultation meetings to the various target audiences. Advertising the project and the associated meetings via radio or television and making direct calls (in case fixed line or mobile phone communication is available) is another method that allows reaching out to the remote audiences. The announcement of a public meeting or a hearing is made sufficiently in advance, thereby enabling participants to make necessary arrangements, and provides all relevant details, including date, time, location/venue and contact persons.

Placement of the project materials in the public domain is also accompanied by making available a register of comments and suggestions that can be used by any member of the affected parties, other stakeholders and general public to provide their written feedback on the contents of the presented materials. As a rule, the register is made available for the entire duration of the requisite disclosure period. Where necessary, a project representative or an appointed consultant should be made available to receive and record any verbal feedback in case some stakeholders experience a difficulty with providing comments in the written form.

Drafting an agenda for the consultation meeting is an opportunity to provide a clear and itemized outline of the meeting's structure, sequence, chairpersons, a range of issues that will be discussed and a format of the discussion (e.g. presentation/ demonstration followed by a Questions & Answers – Q&A session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the mutual exchange of ideas). A clearly defined scope of issues that will be covered at the meeting gives the prospective participants an opportunity to prepare their questions and comments in advance. It is essential to allocate a sufficient amount of time for a concluding Q&A session at the end of any public meeting or a hearing. This allows the audience to convey their comments and suggestions that can subsequently be incorporated into the design of the project. Keeping a record of all public comments received during the consultations meetings enables the project's responsible staff to initiate necessary actions, thereby enhancing the project's overall approach taking onto consideration the stakeholders' priorities. The recorded comments and how they have been addressed by the project become an appropriate material for inclusion in the project's regular reporting to the stakeholders.

As a possible option in addition to the Q&A session nearer the close of the public meeting/hearing, evaluation (feedback) forms may be distributed to participants in order to give them an opportunity to express their opinion and suggestions on the project. This is particularly helpful for capturing individual feedback from persons who may have refrained from expressing their views or concerns in public. Questions provided in the evaluation form may cover the following aspects:

- Participant’s name and affiliation (these items are not mandatory if the participant prefers to keep the form confidential)
- How did they learn about the Program and the consultation meeting?
- Are they generally in favour of the Program?
- What are their main concerns or expectations associated with the Program or the particular activity discussed at the meeting?
- Do they think the Program is of benefit to them and the stakeholder group they represent?
- Is there anything in the Program design and implementation that they would like to change or improve?
- Do they think that the consultation meeting has been useful in understanding the specific activities of the Program, as well as associated benefits and outcomes? What aspects of the meeting do they particularly appreciated or would recommend for improvement?

Bearing in mind that some of the participants might find completion of the evaluation form challenging due to the literacy constraints or concerns about their confidentiality, the distribution of the feedback forms should always be explained that completing the form is optional. Program beneficiaries should also be assured that completion of the evaluation form is entirely voluntary and does not affect their status as beneficiaries. Some persons may be willing to express their feedback verbally and in this case Project staff will be allocated to take notes.

Distribution of targeted invitations to the consultation meeting or a hearing is an important element of the preparation process and is based on the list of participants that is compiled and agreed in advance of the consultation. Invitations may be sent both to certain individuals that have been specifically identified as relevant stakeholders (e.g. representatives of government ministries and agencies) and as public invitees (e.g. addressed to initiative and professional bodies, local organizations, and other public entities). Means of distributing the invitations should be appropriate to the customary methods of communication that prevail for the stakeholder. The various means of distribution that can be used includes direct mail (post); other existing public mailings, utility bills, or circulars from a local authority. All invitations that are sent can be tracked in order to determine and manage the response rate. If no response has been received, the invitation can be followed up by a telephone call or e-mail where possible.

4.3 Description of Engagement Methods

International standards increasingly emphasize the importance of a consultation being 'free, prior and informed', which implies an accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information. In order to fulfil this requirement, a range of consultation methods are applied.

A summary description of the engagement methods and techniques that will be applied by the Nigeria CARES Program is provided in table 4.1 below. The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.

An attendance list should be made available at the commencement of all engagement activities in order to record all participants who are present at the meeting. Wherever possible, attendees' signatures should be obtained as a proof of their participation. Details of the attendees who were not initially on the list (e.g. those participating in place of somebody else, or general public) should be included in addition to those who have registered for the meeting in advance.

In most cases and as a general practice, the introductory initial part of the meeting should be delivered in a format that is readily understandable to the audience of laypersons and should be free of excessive technical jargon. If necessary, preference should be given, whenever possible, to the oral and visual methods of communication (including presentations, pictorials, illustrations, graphics and animation) accompanied by hand-out materials imparting the relevant information in understandable terms rather than as text laden with technical intricacies.

If a large audience is expected to attend a public meeting or a hearing, necessary arrangements will be made to ensure audibility and visibility of the presentations. This includes provision of a microphone, proper illumination, projector, places allocated for the wheelchair users, etc. The specific considerations for vulnerable persons are summarised in table 4.4.

Taking records of the meeting is essential both for the purposes of transparency and the accuracy of capturing public comments. At least three ways of recording may be used, including:

- Taking written minutes of the meeting by a specially assigned person or a secretary;
- audio recording; and
- Photographing.

The latter should be implemented with a reasonable frequency throughout the meeting, allowing notable scenes to be captured but at the same time not distracting or disturbing the audience excessively. Where feasible, a video recording may also be undertaken. Combination of these methods ensures that the course of the meeting is fully documented and that there are no significant gaps in the records which may result in some of the important comments received from the stakeholder audience being overlooked.

Table 4.1: Methods/Tools for Information Provision, Feedback, Consultation and Participation

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
Information Provision					
Distribution of printed public materials: leaflets, brochures, fact sheets	Used to convey information on the Program and regular updates on its progress to local, regional and national stakeholders.	Printed materials present illustrative and written information on the CARES program. Presented contents are concise, clear and easy to understand by a layperson reader. Graphics and pictorials are widely used to describe technical aspects and aid understanding.	• Distribution as part of consultation meetings, awareness campaigns, discussions and meetings with stakeholders. • Conduct a workshop to develop standard messages for campaigns and interventions to be used for priority target audiences • Conduct mass media campaigns both at national media and local stations • Conduct social media campaign on (Facebook, Twitter, YouTube, WhatsApp etc). • Preparing briefs for policymakers, web pages for the general public, guides for technical staff, reports or videos to local stakeholders (e.g. village committees) and project participants.	▪ Government Ministries, Departments and Agencies at state and Federal levels ▪ All project affected parties ▪ Project interested parties ▪ Other potential stakeholders	At onset of the Program
Distribution of printed public materials: newsletters/ updates	A newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of Program achievements, announcements of planned activities, changes, and overall progress.	• Circulation of the newsletter or update sheet with a specified frequency in the Project Area of Influence, as well as to any other stakeholders that expressed their interest in receiving these periodicals.	▪ All projected affected parties ▪ All project interested parties ▪ Implementing Agencies and Partners	Quarterly through the life cycle of the program

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
			• Means of distribution – post, emailing, electronic subscription, delivery in person. • The mailed material can be accompanied by an enclosed postage-paid comment/feedback form that a reader can fill in a return to the Project's specified address.	▪ Government Ministries, Departments and Agencies	
Printed advertisements in the media	Inserts, announcements, press releases, short articles or feature stories in the printed media – newspapers and magazines	Notification of forthcoming public events or commencement of specific Project activities. General description of the Program and its benefits to the stakeholders.	• Placement of paid information in local, regional and national printed media, including those intended for general reader and specialised audience • Arrange for outdoor advertising	▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders	At start of specific activities
Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV.	Description of the Program, Program development update and processes. Advance announcement of the forthcoming public events or commencement of specific Program activities.	▪ Collaboration with media producers that operate in the region and can reach local audiences. ▪ Documentary campaign at national and state stations on impact and success story in local communities ▪ Production of musical sting for to be used in sponsored radio programmes	▪ Government Ministries, Departments and Agencies ▪ Implementing agencies and partners ▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders	10 minutes weekly updates
Visual presentations	Visually convey Project information to affected	Description of the Project activities, processes and timeline.	▪ Presentations are widely used as part of the public hearings and	▪ Participants of the public hearings, consultations, rounds tables, focus	As needed

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	communities and other interested audiences.	Updates on Project development.	other consultation events with various stakeholders. ▪ Video simulation ▪ animations	group discussions and other forums attended by Project stakeholders. ▪ Government Ministries, Departments and Agencies	
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, post offices, shop, local administrations.	▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders	Regularly
Information Feedback					
Information repositories accompanied by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designate d locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various Project-related materials and documentations.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience are also given free access to a register of comments and suggestions.	▪ All projected affected parties	Weekly update
Dedicated telephone line (hotline) (toll free)	Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or	Any issues that are of interest or concern to the direct project beneficiaries and other stakeholders.	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist	▪ Any project stakeholder and interested parties.	Available all through the project cycle

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	provide feedback on the Project. Initially, telephone numbers of Project's specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations, social and environmental protection.		experts or to offer a call-back if a question requires detailed consideration.		
Internet/Digital Media	Launch of Project website to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public. Website should have a built-in feature that allows viewers to leave comments or	Information about Project operator and shareholders, Project development updates, employment and procurement, environmental and social aspects.	A link to the Project website should be specified on the printed materials distributed to stakeholders. Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc. Limitation: Not all parties/stakeholders have access to the internet, especially in the remote areas and in communities.	▪ Project stakeholders and other interested parties that have access to the internet resources.	Available all through the project cycle

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	ask questions about the Project. Website should be available in English				
Surveys, Interviews and Questionnaires	The use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.	Description of the proposed Project and related processes. Questions targeting stakeholder perception of the Project, associated impacts and benefits, concerns and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups. Administering questionnaires as part of the household visits.	▪ All project affected parties.	
Feedback & Suggestion Box	A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project. Contents of the suggestion box should be checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the stakeholders. Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.	▪ Project affected parties, especially vulnerable groups.	

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
Consultation & Participation					
Public hearings	Project representatives, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	▪ Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media. ▪ Targeted invitations are sent out to stakeholders. ▪ Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing. ▪ Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period.	▪ Project affected parities ▪ Relevant government Ministries Departments and Agencies. ▪ NGOs and civil societies ▪ Other interested parties	▪ On a need basis
Focus Group Discussions and Round Table Workshops	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, processes that require detailed discussion with affected stakeholders.	Announcements of the Forthcoming meetings are widely circulated to participants in advance. Targeted invitations are sent out to stakeholders.	▪ All project affected parties especially vulnerable groups; ▪ Project delivery agencies ▪ CARES employees and contractors ▪ NGOs and civil societies ▪ Implementing Agencies and Partners ▪ Relevant Government Ministries and Agencies	▪ On a need basis

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
Project Implementation Units (PIUs)	Project's designated venue for depositing Project-related information that also offers open hours to the stakeholders and other members of the public, with Project staff available to respond to queries or provide clarifications.	Project-related materials. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the info centre or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.	▪ All project affected parties ▪ Project interests' parties ▪ Other potential stakeholders	▪ Through the entire program cycle
Non state actors, Traditional / Community leaders	Develop and secure clearance processes for timely dissemination of program messages and materials in local languages and in English, where relevant, for timely dissemination of messages and materials and adopt relevant communication channels	Project related information, SEA/SH, Nondiscriminatory prohibition messages program impact, benefits and available feedback channels	Community outreach / town criers dedicated Toll-free telephone lines, fliers and town hall meeting adhering to NCDC and state applicable COVID-19 protocol.	✦ All project affected parties ✦ Project interests' parties ✦ Other potential stakeholders	✦ Defined regular times to coincide with local customs.
National / State Legislators	getting issues on to the policy agenda, Public opinion,	Preparing briefs for policymakers, on updates and performance scorecard	✦ Face to face meetings	✦ Project interests' parties ✦ Other potential stakeholders	✦ On a need basis

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	generating endorsement and awareness of programmes Change (or no change) in policy content		✦ Meetings with elected officials in communities surrounding programme. ✦ Meetings with officials ✦ Press conferences ✦ Interviews (media traditional and digital) ✦ Social Media Strategy ✦ Digital PR		

Table 4.2: Consultation methods for vulnerable groups

Category	**Method of consultation**
Elderly	Recognize their organization and leadership, Focus Group meetings, Assisted transport to meetings
Women	Additional separate Focus Group meetings, recognize cultural norms
Youth	Additional Focus Group meetings
Minority groups	Focus Group meetings in a language of their understanding
Disabilities	Recognize their organization and leadership, Focus Group meetings, Assisted transport to meetings

4.4 Institutional Stakeholders Engagement

Policy coordination at the national level is the highest level of engagement. This level comprises not only the presidential office and line ministries responsible for the different social protection programs and other relevant interventions (such as education and resilience), but it also includes donors, CSOs, and development partners.

Coordination is broken down into two elements: setting up agreements on the shared goals that are to be achieved and increasing the integration of activities of different programmes to achieve those common goals. These different aspects of coordination take place at different levels of governance: whilst goal coordination will occur at the national level by greater coherence between policies and programme design, coordination of means and activities will take place at the district and sub-district level through greater integration of operational/administrative activities. Finally, coordination will be required within each level of governance (horizontal coordination), as well as between the levels (vertical coordination) (ILO, 2016). Figure 4.3 provides a visual representation of these different levels and types of coordination required for the CARES Program.

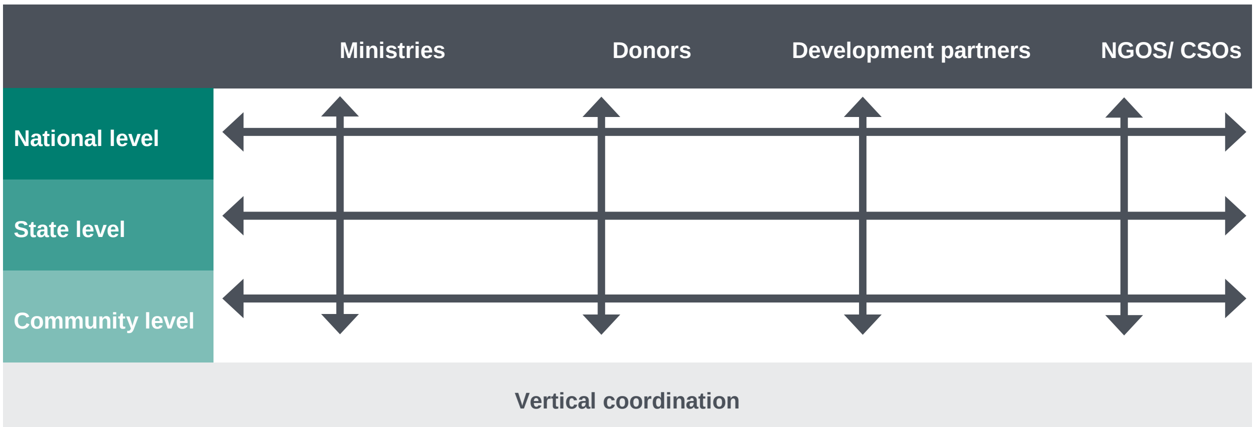

Figure 4.3: Dimensions of Coordination
Source: adapted from ILO (2016)

4.4.1 Institutional coordination

The ILO defines institutional coordination as the "alignment and harmonisation of all stakeholder activities (at the operational level) in a coherent and holistic way to reach clearly identified and shared objectives (at the policy level)" (ILO, 2016: p. 9). In the context of social protection, “stakeholders” encompass all the actors – at the national and local level, as well as the various development partners and local CSOs – involved in the policy, planning and implementation of social protection programmes.

Thus, the objective of increased coordination is to take advantage of the complementarities that exist between different programmes by increasing the interaction between them as indicated in the framework for stakeholder engagement of the implementing agencies, and is found to lead not only to better performance of individual programmes, but also of the social protection system as a whole, both with regards to the efficiency, but also with regards to their effectiveness in addressing vulnerability and building resilience.

The framework for stakeholder engagement of the implementing agencies under the technical component result area 4 is indicative in figure 4.4. below.

- Starting from the bottom-up, program-specific Technical Working Group (TWG) should be strengthened and continue to play an important function of intra-program coordination,
- program specific groups are still needed as a link between the local existing program and the national level CARES Program.
- The next layer is the pillar working result areas 1-3 groups, which reflect the new pillars of the CARES.
  - We recognize that this layer creates another set of meetings for people to attend with important time implications, but we also acknowledge that for the individual programs to move beyond their siloed objectives, and to reflect the increased coherence of CARES as a set of programs to achieve objectives beyond their individual programs,
  - it is important to create space and to invest time in these pillars.
  - Given people’s time constraints, one option would be for the pillar working result areas 1-3 groups to meet according to demand, possibly less frequently than the program-specific groups and the systems groups.
  - However, this does require the pillar groups to be efficient and strategic.

- Above the pillar-level coordination groups there are three proposed systems working groups, which would aim to promote inter-program and cross-sectoral collaboration and integrate the task forces, which are currently operating separately.
- The objectives of these would be:
  - to focus on strategy and planning across the program,
  - to discuss technical issues across the three areas, with communication across the three working groups, and
  - to make concrete recommendations on key decisions to the Technical Committee.

- The suggested groups include:
  - **Financing** (to discuss funding options, new contingency funds, multi-year funding, pooled funding, linking humanitarian and social protection funding);
  - **Monitoring, evaluation and learning (MEL)** (including M&E around policy and programming);
  - **Systems strengthening and capacity building** (to discuss BNR, delivery mechanisms, **grievance mechanisms**, gender issues, training etc. at national and district).

The systems working groups would feed into the CARES Technical Committee. The function of the CARES Technical Committee and CARES Steering Committee would remain largely the same, taking into consideration the pre-requisites needed. One additional option to consider here is that there could be a cabinet Committee recognizing the political influence the program may generate among the National Assembly and the Nigeria Governors Forum.

Figure 4.4 is the re-configured existing coordination structures in line with the Nigeria CARES by integrating pillar-level and systems working groups on the existing structure. This option places greater emphasis on CARES cross-program coordination objectives (related to Result Area 4 and systems strengthening) and to strengthen the cross-program coordination role of the Federal CARES Unit.

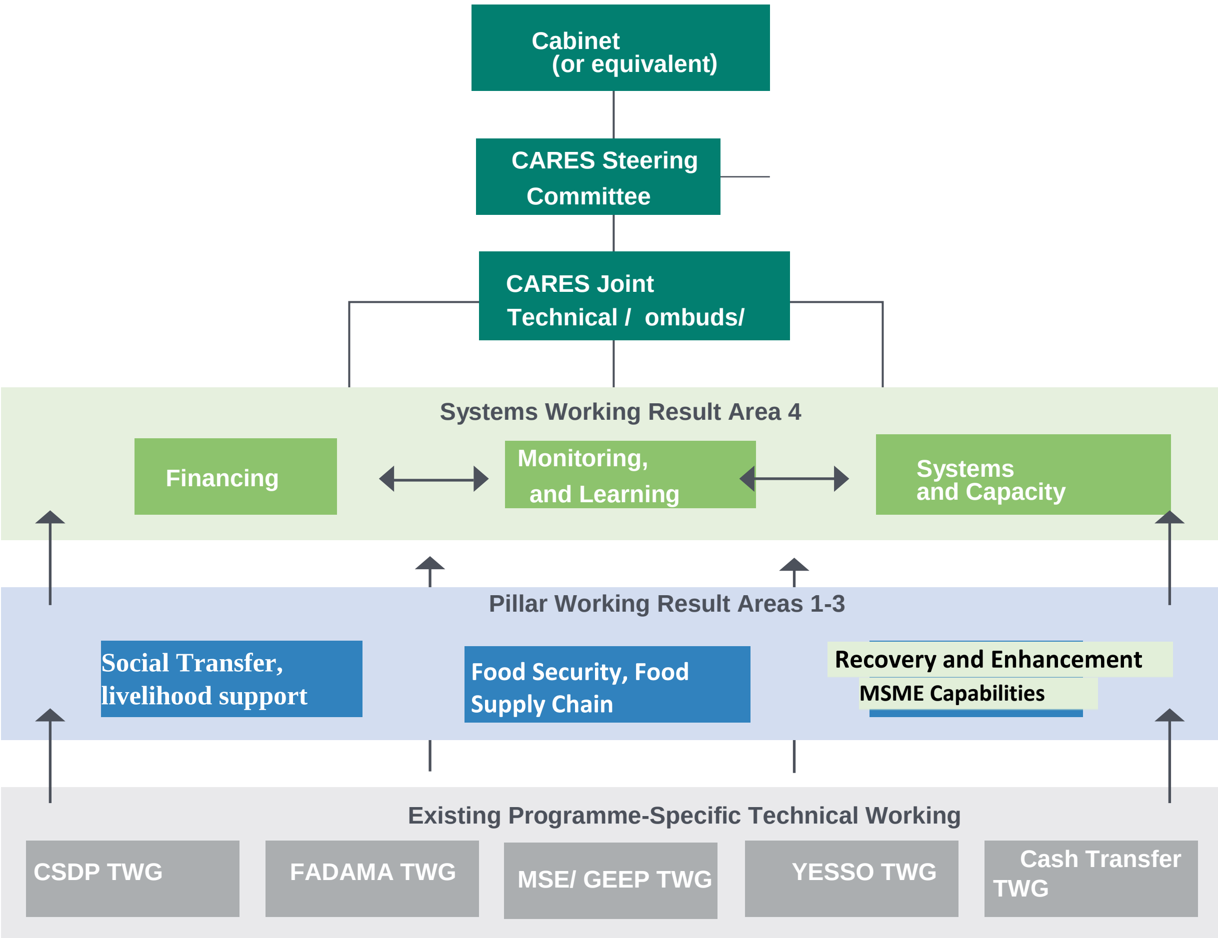

Figure 4.4: Re-configured existing coordination structures in line with the Nigeria CARES

4.5. Consultation with Stakeholders

When consultation actually takes place, it should be after an extensive period of preparation, as outlined in the previous stages, and should exhibit the following characteristics. Any consultation should be:

Representative: it is important that those involved in the consultation process are as representative as practicable of the full range of stakeholders affected by the CARE Program actions, to ensure that the Program can build as meaningful relations as possible (see Section 4.6). While it may be easier to engage with the most sympathetic, organised, vocal or powerful stakeholders, consulting with minority organisations or those who are less vocal or powerful, can help to produce more representative, accurate and appropriate conclusions regarding stakeholders' issues and mechanisms to address those issues, thus allowing the Program to more effectively and successfully respond to stakeholders. Winning the support of one or two 'big' stakeholders does not necessarily indicate that meaningful engagement has been achieved; not all community or environmental groups (for example) have the same view of or priority for an issue.

Responsive: by providing information, analysis and proposals that respond directly to stakeholder expectations and interests already identified through the preparation phases – i.e. be stakeholder driven and focused, rather than responding to internal objectives and activities of the business, or being shaped by your organisation's organisational behaviour

Context focused: by making available information and analysis that is contextualised so that stakeholders are able to gain a detailed, holistic and complete picture of the CARE Program and organisational motivations, culture and behaviour, and assess the relevance of each of these to the ultimately observed organisation's action with respect to the CARE Program

Complete: by providing appropriate background information together with the historical or analytical basis to certain decisions, thus allowing stakeholders to draw a 'fair and reasonable' conclusion as to why the organisation responded in a particular way to an issue. An efficient internal knowledge management system will help collate and provide this information.

Realistic: in the 'negotiation' process with stakeholders there may be an inevitable trade off of expectations, needs and objectives, where both parties recognise that they may not ultimately achieve everything they had originally set out to accomplish. Nevertheless, this trade off in itself can be extremely positive to the overall engagement process, allowing trust to be strengthened as each side demonstrates that they can be moderate and realistic, ahead of a significant commitment in time and resources being made. As part of this process, ensure there is accurate representation of the intentions of the CARE Program and implementing organisation, providing clarity on expectations of the 'negotiation' i.e. what is on the table for discussion and what is not.

4.6 Disclosure and Participation Plan

Information disclosure is an important activity not just as a form of engagement but for also enabling the other engagement activities to be undertaken in an informed and participatory manner. This section outlines the process to be followed for the disclosure and participation as part of the CARES Project implementation.

It is required under ESS 10 that the Proponent will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

4.6.1 Disclosure Mechanism

The process of information disclosure can be undertaken in two ways: either voluntary disclosure or disclosure as part of the regulatory requirements (EIA requirements, public hearing). While regulatory disclosure involves the provisioning of information as required by the authorities and agencies involved in the project, voluntary disclosure refers to the process of disclosing information to the various stakeholders in a voluntary manner.

This disclosure not only allows for trust to be built amongst the stakeholders through the sharing of information, but it also allows for more constructive participation in the other processes of consultation and resolution of grievances due to availability of accurate and timely information.

4.6.2 Process for Disclosure of Information

As a standard practice, this SEP in English will be released for public review for the period of 21 days in accordance with Nigerian Regulatory Frameworks. Distribution of the disclosure materials will be done by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access. Free printed copies of the SEP in English will be made accessible for the general public at the following locations:

- Federal Ministry of Finance (FMoF);
- Federal Cares Program Support Unit
- State CARES Coordination Unit
- Community and Social Development Agency (CSDA),
- State Cash Transfer Units- “NASSP”,
- State FADAMA or Agriculture Development Agencies,
- MSE Unit/Ministry of Commerce and GEEP
- State Jobs Creation Units/SME Agency
- Federal Ministry of Women Affairs and Social Development (FMWSD);
- Technical Working Group (TWG) on Social Development, Ministry of Labour and Productivity
- The EA Department of the Federal Ministry of Environment; and
- Other designated public locations to ensure wide dissemination of the materials.

Electronic copies of the SEP will be placed on the website of the Bank and each implementing agencies. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an online feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

The mechanisms which will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of the aforementioned disclosed materials to local, regional and national NGOs, relevant professional bodies as well as other interested parties. Translation of the executive summaries in relevant local language and its posting in the designated community centres.

4.7 Timetable for Disclosure

The disclosure process associated with the release of project E&S appraisal documentation, as well as the accompanying SEP will be implemented within the following timeframe:

- Placement of the SEP in public domain – Dates to be confirmed by CARES Implementing Agencies
- 21-day disclosure period – Dates to be confirmed by CARES Implementing Agencies
- Public consultation meetings with project stakeholders to discuss feedbacks and perceptions about the program – Dates to be confirmed by CARES Implementing Agencies
- Addressing stakeholder feedback received on the entire disclosure package – Dates to be confirmed by CARES Implementing Agencies.

The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment.

The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table 4.2 below provides a description of stakeholder engagement and disclosure methods recommended to be implemented during stakeholder engagement process.

Table 4.3: Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
• Project Affected Parties	• Stakeholder Engagement Plan; • Public Grievance Procedure; • Regular updates on Project development.	• Public notices. • Electronic publications and press releases on the Project website. • Dissemination of hard copies at designated public locations. • Press releases in the local media. • Consultation meetings. • Information leaflets and brochures. • Separate focus group meetings with vulnerable groups, as appropriate. • Virtual Meeting online, webinar, observance of NCDC protocol and WB guideline on consultation
• Non-governmental Organizations	• Stakeholder Engagement Plan; • Public Grievance Procedure; • Regular updates on Project development.	• Public notices. • Electronic publications and press releases on the project website.

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
		• Dissemination of hard copies at designated public locations. • Press releases in the local media. • Consultation meetings. • Information leaflets and brochures. • Virtual Meeting online, webinar
• Ministries, Departments and Agencies	• Stakeholder Engagement Plan; • Regular updates on Project development; • Additional types of Project's information if required for the purposes of regulation and permitting.	• Dissemination of hard copies of the ESSA package, and SEP at municipal administrations. • Project status reports. • Meetings and round tables. • Virtual Meeting online, webinar
• Implementing Agencies	• Stakeholder Engagement Plan; • Regular updates on Project development; • Additional types of Project's information if required for the purposes of implementation and timeline.	• Public Notices • Consultation Meetings • Information leaflets and brochures. • Virtual Meeting online, webinar
• Related businesses and enterprises	• Stakeholder Engagement Plan; • Public Grievance Procedure; • Updates on Project development and tender/procurement announcements.	• Electronic publications and press releases on the Project website. • Information leaflets and brochures. • Procurement notifications. • Virtual Meeting online, webinar
• Project Employees	• Employee Grievance Procedure; • Updates on Project development.	• Staff handbook. • Email updates covering the Project staff and personnel. • Regular meetings with the staff. • Virtual Meeting online, webinar • Posts on information boards in the offices and on site. • Reports, leaflets.

CHAPTER 5: RESOURCES AND RESPONSIBILITIES

5.1 Introduction

In this sub-section the proposed organizational structure and management functions for the stakeholder engagement function at CARES are described. The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within participating state PIU and local sub-contractors.

The roles and responsibilities of the organizations are presented below in Table 5.1. The Project Implementation Unit (PIU) will be responsible for the preparation and physical implementation of the CARES Programme.

Table 5.1: Organizational Roles and Responsibilities

Role	Responsibility / Accountability
Program Coordinator	• Ensure proper implementation and follow up of the SEP. • Ensure that contractor's and CARES employees are informed and trained on the SEP. • Ensure the CARES ESHS team reports on time and with the expected and agreed points. • Provide resources to ensure that interests of stakeholders are represented and taken into consideration during implementation of Program.
	• Ensure that employees and subcontractors have in their contracts a stakeholder engagement/community relations management clause and they are aware and trained on the SEP. • Coordinate required SEP support and trainings for staff in coordination with ESHS team and Human Resources Manager.
ESHS Team	**Social Manager/Community Liaison Officer (CLO):** Neutral individual ideally recruited locally, who speaks the dominant local language, and should be proven not to have a personal interest in a particular outcome. As the primary interface between the Project and stakeholders, including the local community, the Social Manager/CLO will: • Lead the SEP from the sponsor perspective and coordinate the results and actions to be taken with the H&S and Environmental Manager and later with the CARES Team • Review the SEP viability with the H&S and Environmental Manager • Lead day-to-day implementation of the SEP and Community Grievance Mechanism, including proactively maintaining regular contact with affected communities through regular community visits to monitor opinions and provide updates on Project activities, and ensuring communication with vulnerable groups. • Produce stakeholder engagement monitoring reports and submit to Program Coordinator. • Supervise/monitor and coordinate activities with the CLO to ensure that staff and all sub-contractors comply with the SEP. • Manage the day-to-day working, utilization, implementation of SEP by all parties engaged on the Program. **Health and Safety Manager:** • Review the SEP ensuring compliance in terms of H&S requirements and provide feedback to Social Manager/CLO. **Environmental Manager:**

	• Review the SEP ensuring compliance in terms of environmental requirements and provide feedback to Social Manager/CLO
subcontracted employees	• Comply with requirements stated under this document - Non-compliance will be treated as a disciplinary matter. • Provide assistance if needed to ensure compliance with this plan. • Perform assigned tasks towards meeting SEP objectives. • Communicate concerns, questions or views to their supervisor or the CLO compliance or implementation of the SEP. • Provide data related to SEP performance/monitoring as required.

In order to advance the CARES Program and ensure availability of resources, the PIU will work collaboratively with some of the Federal and State Ministry of -Implementing departments and stakeholders such as (i) Purchasing, (ii) Finance, (iii) Customer Services, (iv) Technical Services Department, (v) Tender Committee, (vi) and Public Affairs Department on a needed basis. The roles and responsibilities, their interest and potential influence, and the internal coordination and communication arrangements are summarised below.

Table 5.2: Resources facilitation

Departments	Role	Interest	Influence	Coordination	Frequency
Purchasing	coordinate overall procurement under the program and prepare and revise Procurement Plans as needed	High	High	Hold meetings to update procurement plans and review delivery timelines that have high project risk impact	Regularly (quarterly)
Finance	account for the deposits and withdrawals of project funds with Financial institution(s) perform the audits and provide financial reports in accordance with the World Bank rules and guidelines	High	High	Hold meetings to evaluate project financial performance	Regularly (quarterly)
Public Affairs	Work with the Social Officer to conduct stakeholder engagement and project disclosure and outreach activities	High	Low	Hold meetings to review and update stakeholder engagement plan	Regularly
Tender Committee	Ensure timely approval of procurement processes and	High	High	Provide updates on project progress through reports and meetings to discuss project risks that need their intervention	Regularly

5.1.2 External Resources

In case the internal resources at the project appear to be insufficient, the project will also consider engaging a reputed third party in the form of the organization familiar with the region and are acceptable to the community. The NGO would then not only serve as a link between the CARES project and the community but as a third party in the implementation of the SEP and GRM.

5.1.3 Training

The project will, from time to time assess the adequacy and capacity of the PIU team members in terms of their understanding of the SEP and GRM put in place for the project and the principles governing the same. Provisions for refresher trainings will be put in place at the commencement of the project effectiveness and annually thereafter.

All parties involved on the SEP will attend a workshop that will orient everyone about the Project and appraise all individuals of responsibilities and reporting structures.

5.1.4 Financial Resources

The project will ensure that the budget formulated for the purpose of the stakeholder engagement process and grievance redress is sufficient to meet the expenses of the same. In case of grievances requiring monetary compensation, the amount for the same will be provided through the dedicated escrow account set up for the project.

5.1.5 Budget

The Project Implementation Unit has an adequate standing budget allocated towards the Stakeholder Engagement Program. This is a budget that, as at when necessary, will be supplemented and/or increased by other budgets related to the activities required for the SEP. Once the project has been finalised, a detailed budget for the implementation of this SEP will be provided and this will be included in the updated SEP. Annex 1 has a proposed budget line for SEP for participating States.

CHAPTER SIX: Grievance Management

In compliance with applicable local and national laws and essentially the World Bank's ESS10, a project-specific mechanism is being set up to handle complaints and issues. This process has been specially designed to collect, collate, review and redress stakeholders' concerns, complaints and grievances. This process will be carried out using dedicated communication materials (specifically, a GRM brochure or pamphlet) which will be developed to help stakeholders become familiar with the grievance redress channels and procedures as indicated in figure 6.1.

Locked suggestion/complaint boxes will be posted in each implementing agency and participating communities as relevant and they will maintain a grievance register in order to capture and track grievances from submission to resolution and communication with complainants. Project website (and that of the implementing agencies) will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder. It will also provide information on the way grievances will be handled, both in terms of process and deadlines.

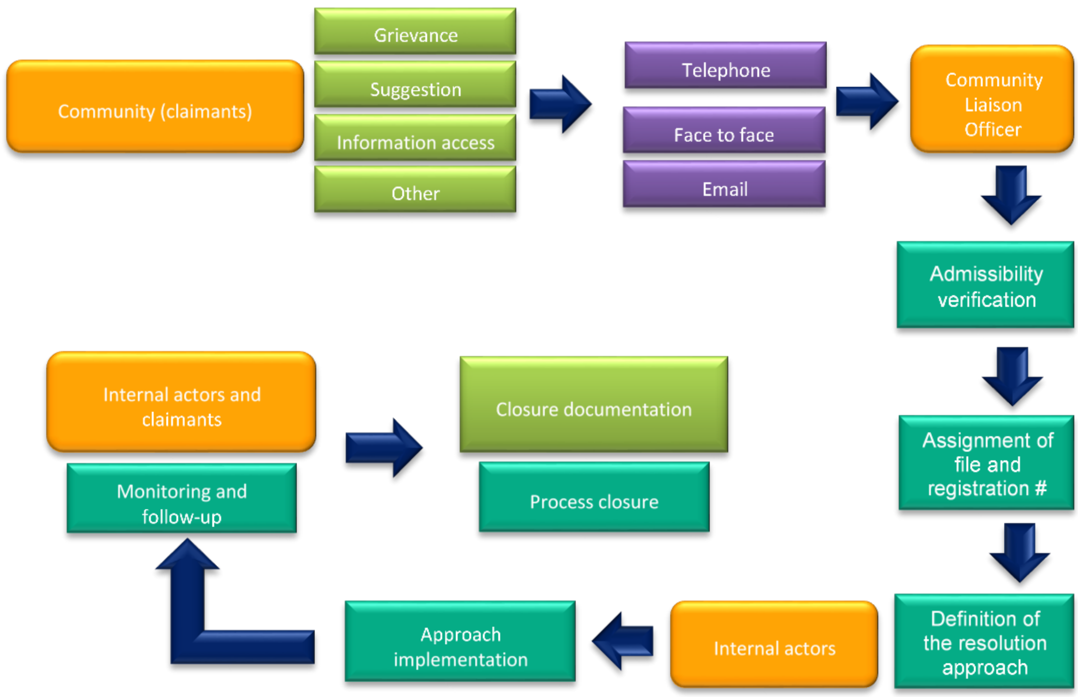

Figure 6.1: Grievance Mechanism flowchart

6.1 Grievance Redress Mechanism (GRM)

Project-affected-people and any other stakeholders may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). The overall objectives of the GRM are to:

- Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to specifics in program components.
- Strengthen accountability to beneficiaries, including project affected people.

The GRM will be accessible to all external project stakeholders, including affected people, community members, civil society, media, and other interested parties. Stakeholders can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the program as it affects them. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. The initial effort to resolve grievances to the complainant's satisfaction will be undertaken by the participating section / unit of each implementing agency. If the unit is not successful in resolving the grievance, the grievance would be escalated to the implementing agency's grievance unit and if unsuccessful at this stage, the grievance will be escalated to the CARES PIU at the Federal level. All grievance that cannot be resolved at that level shall be allowed to go the court of law.

6.2 Grievance Resolution Framework

Information about the GRM will be publicized as part of the initial program consultations and disclosure in all the participating agencies. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project implementation unit offices, notice boards available to strategic stakeholders, etc. Information about the GRM will also be posted online at the implementing agencies' websites. However, in the case of GBV/SEA/SH related complaints, the GRM officer/ project shall not under any circumstance, investigate any GBV/SEA/SH complaint or document any information save the information the survivor is willing to freely give following survival centred approach.

The overall grievance resolution framework will include six steps described below. The six steps demonstrate a typical grievances resolution process.

- ***Step 1: Uptake.*** Project stakeholders will be able to provide feedback and report complaints through several channels such as filling up grievance forms, reporting grievances to implementing agencies, submitting grievance via email address made available by the implementing units and via the implementing institutions' websites collection boxes stipulated for the grievance uptake.
- ***Step 2: Sorting and processing.*** Each unit / department of the implementing institutions will conduct a prompt sorting and processing of all grievances. The processing will involve the internal escalation process to specific desks to review, resolve and respond to grievances raised.
- ***Step 3: Acknowledgement and follow-up.*** Within seven (7) days of the date a complaint is submitted, the responsible person within the unit will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. The information provided to

complainant would also include, if required, the likely procedure if complaints had to be escalated outside the unit and the estimated timeline for each stage.

- ***Step 4: Verification, investigation and action.*** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

  Step 5: Monitoring and evaluation. Monitoring refers to the process of tracking grievances and assessing the progression toward resolution. Each implementing agency would develop and maintaining a grievance register and maintain records of all steps taken to resolve grievances or otherwise respond to feedback and questions.

  Step 6: Providing Feedback. This step involves informing those who have raised complaints, concerns or grievances the resolutions to the issues they have raised. Whenever possible, complainants should be informed of the proposed resolution in person, which gives them the opportunity ask follow-up questions which could be answered on the spot for total resolve. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the World Bank, as described below, or through a court of competent jurisdiction.

6.3 CARES Grievance Escalation Process

GRM Stage One - Specific Implementing Department Level Resolution

This stage represents the grievances collection points by specific units of the implementing agencies. As stated in the six steps framework above, this stage would involve the uptake; collation, sorting and processing; acknowledgement and the resolve as described in stage 4 – verification, investigation and action. All implementing agencies would attempt a full resolve of grievances at this stage as much as practical. A typical example of this stage process is each grievance committee at each unit of the implementing agency activating steps 1 to 4 as stated above to respond to all grievances raised to the institution. The grievance committee at each unit of implementing agencies would deploy all effort as much as practical at this stage to ensure all grievances raised to it has been adequately resolved to the satisfaction of all parties involved. Should the complainant not be satisfied at stage one, the grievances shall be escalated to stage two.

GRM Stage Two – Implementing Agency Level Resolution

The central platform for receiving, sorting and assigning stage two grievance will be located in the respective State CARES Implementing Agency. Once received, sorted and processed at State Implementing Agency, grievances related to different implementing agencies will be forwarded to the respective agencies. The stage two is a grievance redress platform led by the main implementing agencies. Every implementing agency would establish a grievance management unit which would deal with all the grievances escalated to it from the different units. These implementing agencies would apply the stage four as mentioned under the framework to address and resolve all grievances promptly within seven (7) days and communicate the feedback to the complainants. Any complaints or grievances not resolved at this stage shall be escalated to the CARES Ombudsman.

GRM Stage Three – CARES Grievance Redress Committee (Ombudsman) Level Resolution

The CARES steering committee shall constitute a Grievance Redress Committee (GRC) that will serve as the CARES GRC Ombudsman along with other Technical committee at the Federal CARES as indicated in figure 4.4 on Institutional coordination of the State and Federal CARES Implementing Agencies. This shall be formed of key social development officers from all the implementing agencies. The ombudsman shall be responsible for resolving all grievances escalated to it within the seven (7) days. The ombudsman shall also meet quarterly to review the grievance registers maintained by each implementing agency and use the same to update the grievance dashboard which shall be the compendium of all grievances raised across implementing agencies.

6.4 Grievance logs

Each implementing agency shall establish a grievance uptake point.

- Individual reference number
- Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously)
- Details of the complaint, feedback, or question/her location and details of his / her complaint.
- Date of the complaint.
- Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.)
- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution.
- Date when proposed resolution was communicated to the complainant (unless anonymous).
- Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution.
- Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out
- If necessary, details of escalation procedure
- Date when the resolution is implemented (if any).

Grievances will be prioritized according to their severity and complexity level. On sensitive issues such as GBV/ SEA the GRC Committee should provide a simple tracking system to document events, staff hear about and observe. This entails developing a simple, anonymous and confidential tracking system that community volunteers/staff can use to document when they observe/hear about GBV incidents, in the program context. It could be as simple as creating a short form or keeping a notebook where staff can record what they have seen or heard without using names or any other identifiers. This approach will enable the project to regularly look and see if there are any spikes in GBV incidents linked to the timing of specific project activities and then plan on ways to mitigate such events

Table 6.2 shows the priority levels that will be applied:

Table 6.1: Grievance priority classification

Priority Level	Description	Examples
High	Concern, claim or grievance involving stakeholders of high priority, and: • Reports a breach to human rights • Relates to a legal non-compliance • Pose a short-term risk to the project continuity,	• Group complaints; • Issues involving third parties (e.g. social, environmental impacts); • Issues relating to GBV and SEA
Medium	▪ Concern claim or grievance from stakeholders (individual or as a group) that could impact the project reputation or compromise its development at medium term.	• Individual complaints; • Issues involving other departments within CARES program
Low	• Concern claim or grievance regarding lack of information or unclear information provided.	Lack of information.

6.5. Monitoring and reporting on grievances

Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Program Coordinator. To ensure management oversight of grievance handling, the –Federal Implementing Agency (CARES) will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

6.6. Points of contact

Information on the project and future stakeholder engagement programs will be available on the project's website and will be posted on information boards in the respective project implementation Units

The point of contact regarding the stakeholder engagement program are:

Federal Ministry of Finance

Description	*Contact details to be Determined (add the contact details once available)*
Name and position	
Address:	Federal Ministry of Finance, Abuja
E-mail:	
Telephone:	To be provided

Federal Ministry of Women Affairs and Social Development

Description	
Name and position	
Address:	Federal Ministry of Women Affairs, Abuja
E-mail:	
Telephone:	To be provided

Federal Ministry of Environment

Description	*Contact details*
Name and position	
Address:	
E-mail:	
Telephone:	To be provided

Federal Implementing Agency (CARES)

Description	*Contact details*
Name and position	
Address:	
E-mail:	
Telephone:	To be provided

State Implementing Agency (CARES)

Description	*Contact details*
Name and position	
Address:	
E-mail:	
Telephone:	To be provided

6.7. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complain directly to the Bank through the Bank's Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service). A complaint may be submitted in English, or in local languages, although additional processing time will be needed for complaints that are not in English.

A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA
- Through the World Bank Nigeria Country Office in Abuja: 102 Yakubu Gowon Crescent, Asokoro, Abuja

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported project. This should be supported by available documentation and correspondence to the extent possible. The complainant may also indicate the desired outcome of the complaint. Finally, the complaint should identify the complainant(s) or assigned representative/s and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns.

In addition, project-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or could occur, as a result of the World Bank's non-compliance with its policies and procedures.

Complaints may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank's attention, and after Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank Inspection Panel may be found at www.inspectionpanel.org.

CHAPTER SEVEN: MONITORING AND REPORTING

7.0 Monitoring and Reporting

The Stakeholder Engagement Plan will be periodically revised and updated as necessary in the course of the Nigeria CARES program implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified stakeholders and methods of engagement remain appropriate and effective in relation to the project context and specific stages of the implementation. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. This includes regular refreshers to stakeholders about the grievance mechanism and related processes and regular Project Monitoring reports and reporting to the different stakeholders as appropriate.

7.1. Reporting

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- Following completion of all engagement activities: review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

A series of key performance indicators for each stakeholder engagement stage have been developed. Table 7.1 shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Table 7.1: Key Performance Indicators by Project phase

Project Phase	Key activities	Indicator
Preparatory & Planning phase for CARES	▪ Preliminary Stakeholder engagement on project designs and anticipated impacts. ▪ Notification on multi-media (posters, radio, TV, CARES website ▪ Official correspondence	▪ Stakeholder engagement reports & records of meetings ▪ Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually); ▪ Frequency of public engagement activities; ▪ Number of notifications & mode of communication ▪ Number of letters/emails sent
Project Implementation	▪ Project Notices issued ▪ Stakeholders Mapping	▪ Newspaper clippings, updates on the CARES website ▪ Geographical coverage of public engagement activities – number of locations and communities covered by the consultation process; ▪ Number and details of vulnerable individuals involved in consultation meetings; ▪ Number of updated versions - at least one updated version within the project cycle

	• Recorded Grievances in the GRM	▪ Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; ▪ Type of public grievances received; ▪ All grievances addressed as per grievance procedure ▪ Pending grievances & suggested resolutions
	▪ SEP Implementation ▪ Public gatherings	▪ SEP Annual reports ▪ Number of public gatherings & records (topics discussed) ▪ Number of press materials published/broadcasted in the local, regional, and national media;
	▪ Official correspondence ▪ Information Disclosure and External ▪ Communication	▪ Number of letters/emails sent ▪ % of received communications being answered through the website ▪ % of received communications being answered through the email ▪ % of answered calls through the telephone exchange.
Project Completion	• SEP implementation Project	▪ SEP Final Report

7.2. Stakeholder Involvement in Project Monitoring

The Involvement of Project-affected stakeholders in the monitoring process will promote transparency and support in addressing stakeholder concerns. Stakeholder participation in monitoring can also empower communities as it enables them to have a role in addressing Project-related issues that affect their lives. This, in turn, strengthens relationships between the Project and its stakeholders.

Stakeholder involvement in monitoring of this Project will include the following:

- Involvement of affected stakeholders when selecting sampling methods for any social surveys or external impact assessments, and in the analysis of results. Training will be conducted where needed to build capacities.
- Observations of monitoring and audit activities by affected parties.
- Grievance follow-up meetings and calls with affected stakeholders.

7.3. Ongoing Reporting to Stakeholders

CARES will produce reports for use by Project stakeholders at stipulated intervals and through specified mechanisms. Reports from various departments will be reviewed and appropriate information presented in synthesized reports to various stakeholders. The modes of reporting shall be as outlined below:

Table 7.2. Outline of Reports to Stakeholders

Report	Content	Stakeholder	Frequency
Technical reports (Financial, Occupational Safety and Health Report, Environmental and Social Audit, Personnel)	Technical Evaluation of the Program status	Regulatory authorities	At agreed timeline

Progress Update Reports and Annual report	• Project development activities, • challenges and opportunities, • local workers hiring status	Federal and State Implementing Agencies World Bank	Quarterly and other agreed timeline
Media release	Main Project milestones	Local media (and national media as appropriate)	At agreed timeline

7.4. Training

CARES Implementing agencies will arrange community & stakeholder engagement overview, principles, tools and goals training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with stakeholder grievances as per the Public Grievance Procedure. Proposed training outline is indicated in annex 3.
Project contractors and selected representatives will also receive necessary instructions for the Grievance Procedure.

ANNEX 1: PROPOSED BUDGET LINE ITEMS FOR STAKEHOLDER ENGAGEMENT FOR PARTICIPATING STATES

Item	Expected Participants	Frequency	Estimated unit cost	Total (US$)
Stakeholder Engagement in programme locations	20	60	Lump sum	7,000.00
Virtual online meetings/ internet with project stakeholders and state counterparts	50	12	22	1,000.00
To carry out the GBV specific inquiries elaborated on earlier (e.g., the information needed to create a referral list, the reaching out to women's organizations, and the gathering of information as a part of the gender analyses process), as well as trainings for staff				1,200
Town-hall meetings in Locations where CARES platform Project exist	50	12	Lump sum	4,500.00
2-Day Primary Stakeholders retreat	40	2	4,000	8,000.00
Subsidiary staffing of the social unit (Salary)	1	12	344	4,000.00
Stakeholder consultative Forum	250	2	3,500	7,000.00
Production of National Jingles for Television and Radio			Lump sum	7,800.00
Production of Newsletter				13,200.00
Programme information kit				
Weekly Sponsored radio Programme			Airtime negotiation	7,000.00
Purchase of audio visual and Public Address systems			Lump sum	1,500,000.00
Purchase of camera				
Purchase of publicity vans Registration & Insurance		3	22,400	67,000.00
Maintenance of Vehicles & Fuelling		12	667.00 / Vehicle	8,000.00
Miscellaneous (Printing etc.)		Lump Sum	8,000	8,000.00
Toll free number		Lump sum		5,600.00

ANNEX 2: CRITERIA AND PROCESSES FOR IDENTIFYING THE POOR AS BENEFICIARIES OF PROGRAMS

Dimension	Statement of criterion
1. Possession of goods and means of production	Having no material possessions
	Owning no luxury goods
	Number of radios owned
	Owning a portable telephone
	Number of chickens/ goat/livestock's
	Number of hoes owned
	Not owning a hoe
	Owning no land, or very little
	Having no cattle for farming
	Mode of transportation
2. Household composition	Being a widower or widow without support
	Being a widower or widow with income
	Being an old person who lives alone
	Being an orphan without support
	Being a childless woman
	Being dependent on one's family
	Household with no member between the ages of 19 and 64 able to work
	Household with one member between the ages of 19 and 64 responsible for more than three persons
	Number of dependent persons in relation to the size of the household
	Number of adult men in the household
	Being over 60 years old
3. Income	Monthly income under 12,000
4. Condition of dwelling	Begging for a living
	Holes in the walls of the dwelling
	Not having a chimney
	Number of rooms in relation to the number of people in the household
5. Occupational status	Occupation
	Having been unemployed for more than two years
Dimension	**Statement of criterion**
6. Food security	Having only one meal a day
	Person showing signs of malnutrition
	Family with a pregnant woman or several severely malnourished children
7. Health status	Being chronically ill
	Having a physical or mental disability
	Persons who are disabled or old
	Persons with a mental health problem
	Being a disabled person over the age of 18 unable to work
8. Education	Number of adults in the household who only know how to read
	Number of female adults in the household who know how to read and write
	Level of education of the head of household

9. Access to basic services and to credit	Source of lighting (gas lamp or electricity)
	Kitchen fuel (coal or kerosene)
	Household with a savings account
	Head of household having had access to a loan from a recognized institute in the past
10. Expenses	Being unable to buy basic foods

Source: Nigeria Living Standards Survey, 2018-19.

Four Types of Entrepreneurial Ventures

	Survival	Lifestyle	Managed Growth	Aggressive Growth
Annual growth rate	Nominal	< 5 percent	10–15 percent	> 20 percent
Time horizon	Day to day	Weekly and monthly operations	1–2 years	2–5 years
Management focus	Selling whatever I have	Maintenance of working business model	Incremental strategic growth	Scalability
Management style	Reactive	Tactical	Strategic	Strategic and proactive
Entrepreneurial orientation	Very low	Low	Moderate	High
Technology investment	None	Limited	Moderate	High
Liability of smallness	Significant	Significant	Less significant	Not significant
Source of finance	Self	Self, family and friends, bank	Self, family and friends, bank, private investors	Bank, private investors, venture capital firms, public markets
Exit approach	Shut down	Shut down, sell, transfer	Sell, merge, transfer	Sell, merge, go public
Management skills	Making, selling	Operational skills, basic management	Planning, strategizing, delegating, leveraging	Planning, innovation, cash flow management, negotiation
Structure	Little to none	Simple	Functional, centralized	Functional; product and market-based
Economic motives	Sustain oneself, one's family	Income substitution	Wealth creation	Wealth creation
Reward emphasis	Weekly income	Salary, bonus	Salary, performance incentives, equity	Equity, capital gain

Source: Distinguishing Types of Entrepreneurial Ventures: An Identity-Based Perspective by Michael H. Morris, Xaver Neumeyer, Yongseok Jang, and Donald F. Kuratko

ANNEX 3: PROPOSED TRAINING OUTLINE

Community & Stakeholder Engagement Overview

- Setting the scene – change, conflict and community/stakeholder engagement
- The links between change and conflict
- The role of community/stakeholder engagement in managing conflict
- A brief history of community/stakeholder engagement processes on existing project or participating state
- Politics and the roles of community/stakeholder engagement
- Changing emphasis in policy development – Accountability, transparency and involvement of social license to operate
- Increasing stakeholder consultation expectations

Community Engagement Principles

- Levels and principles of community/stakeholder engagement
- The importance of early identification of the purpose and function of community/stakeholder engagement
- Different levels of community/stakeholder engagement – ranging from information to participation to partnership
- Is there a difference between community engagement and stakeholder engagement?

Overview & Introduction

- Current skills inventory for community/stakeholder engagement
- Good and bad experiences of community/stakeholder engagement
- Identification of current community/stakeholder engagement process focus areas

Practical Case Examinations

- At the beginning of the course, participants will put forward examples from their own work situations as possible case studies
- Participants will be able to choose to work on their own consultation plan relevant to their project or participate in group selected most applicable case studies to work through using a practical set of principles and approaches for stakeholder engagement and the tools they have gained through the course

Effective community engagement

- The community engagement approach framework – an overview
- How the framework provides a structure for planning
- The links between different sections of the framework
- How to use the framework in the work situation
- stakeholder engagement strategy
- Create a human rights-based model of stakeholder consultation underpinned by community engagement international best practice and regulatory compliance

Engagement Levels, Goals & Communication Levels

- What type of engagement is needed? – the process of making decisions depending on your desired outcomes

- Clarifying what is to be achieved by community/stakeholder engagement – intra-organizational consultation
- Ensuring that the community/stakeholder engagement goals are clearly articulated
- Working up and down within in an organization to ensure agreement on these goals

Risk Assessments & Conflict Management

- Assessing risks and benefits
- Identifying different risk categories
- Likelihood of conflict in the absence of community/stakeholder engagement
- Possible impact of conflict
- Assessment of likelihood of conflict arising during community/stakeholder engagement
- Use of a Risk Assessment Tool for community/stakeholder engagement
- Managing risks – which risks can be avoided, and which must be managed
- Planning the community/stakeholder engagement process to avoid unnecessary conflict
- Where conflict is inevitable, how to ensure it is managed to achieve the most useful outcomes

Stakeholder Management and consultation

- Develop, plan, implement, review and benchmark stakeholder and community engagement programs
- Tailor engagement approaches to respond to diversity and mitigating emerging conflict
- Case study examples will be discussed, based on real life community/stakeholder engagement processes

Resource Allocation & Budgeting

- A standardized budget will be customized for the needs of individual participants and the organizational budgets. It will include all the line items for
    - consideration in a community/ stakeholder engagement process
    - Identifying social investment strategy opportunities which enhance community relationships
    - Influencing organizational stakeholder consultation change

Putting it all Together & Communication Tools

- Communicating clearly – key points
- Communicating via different media – visual, verbal, written
- Using different tools – pamphlets, papers, internet, email, fax, face to face
- What not to do – examples of bad communication and what effect that has on recipients
- Building skills in working with a diversity of people and groups
- When and how to employ professionals/consultants

Review

- Review – identification of key learning points for each individual participant
- What will this mean for your first week back at work?
- What strategies will you use to influence organizational stakeholder consultation change?