



FEDERAL MINISTRY OF WOMEN AFFAIRS

**NIGERIA FOR WOMEN PROJECT SCALE-UP
(P179447)**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

FINAL REPORT

5th December 2022

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ABBREVIATIONS AND ACRONYMS

ACReSAL	-	Agro-Climatic Resilience in Semi-Arid Landscapes (ACReSAL)
AIDS	-	Acquired Immunodeficiency Syndrome
ARAP	-	Abbreviated Resettlement Action Plan
BPE	-	Bureau of Public Procurement
DAI	-	Disclosure and Access to Information
DP	-	Displaced Persons
CIF	-	Community Investment Fund
CLFS	-	Cluster Level Federations
CRP	-	Community Resource Person
CSO	-	Civil Society Organization
EA	-	Environmental Assessment
ESIA	-	Environmental and Social Impact Assessment
ESMF	-	Environmental and Social Management Framework
ESMP	-	Environmental and Social Management Plan
ESSs	-	Environmental and Social Standards
FGN	-	Federal Government of Nigeria
FME _{env}	-	Federal Ministry of Environment
FGD	-	Focus Group Discussion
FMWR	-	Federal Ministry of Water Resources
GBV	-	Gender Based Violence
GEM	-	Growth and Employment
GRC	-	Grievance Redress Committee
HIV	-	Human Immunodeficiency Virus
IDA	-	International Development Association

ICP	-	Investment Climate Program
ICT	-	Information and Communication Technology
IPR	-	Intellectual Property Rights
ITES	-	Information Technology Enabled Services
LGA	-	Local Government Authority
MDAs	-	Ministries Departments and Agencies
NBS	-	National Bureau of Statistics
NFWP-SU	-	Nigeria For Women Scale-Up Project
NGO	-	Non-Governmental Organization
Non IPV	-	Non-Intimate partner violence
OVC	-	Orphan and Vulnerable Children
PAP	-	Project Affected Person
PDO	-	Project Development Objective
PIM	-	Project Implementation Manual
PWDs	-	Persons with Disabilities
FPCU	-	Federal Project Coordinating Unit
RAP	-	Resettlement Action Plan
ROW	-	Right of Way
RPF	-	Resettlement Policy Framework
SEA	-	Sexual Exploitation and Abuse
SH	-	Sexual Harassment
SLM	-	Sustainable Land Management
SMOEs	-	State Ministry of Environment
SPCU	-	State Project Coordinating Unit
SSI	-	Semi Structured Interview

STIs	-	Sexually Transmitted Diseases
TA	-	Technical Assistance
VO	-	Village Organization
WAG	-	Women Affinity Group
WB	-	World Bank
WF	-	Ward facilitator

EXECUTIVE SUMMARY

ES 1 Background

The World Bank is supporting the Federal Government of Nigeria (FGN) to implement the Nigeria for Women Project Scale-Up (NFWP-SU) (P179447) which is aimed at addressing inequalities in women's access to jobs and control over productive assets through the platform of Women Affinity Groups (WAGs). The proposed project will build on the FGN's policies and programs that support women's economic empowerment, leveraging partnerships, particularly with the private sector and creating an enabling environment for women to overcome institutional failures (including market) and barriers to enhancing productive livelihoods and socioeconomic advancement in personal, technical, financial, and entrepreneurial skills.

The Project is a scale-up from the existing Nigeria for Women Project (NFWP) (P161364¹) which has successfully developed and tested a model for formation and strengthening of Women Affinity Groups (WAGs), community-based women-only groups wherein members come together to address their common problems, engage in savings, and lend to one another to support increased incomes and improved livelihoods. The NFWP-SU (the Project) is being implemented across all the six (6) geo-political zones of Nigeria, in areas of fragility, conflicts and climate change issues. While specific subproject locations of the scale-up project are yet to be determined, it is expected to have diverse stakeholders. a t.

Project Description

The proposed Project Development Objective (PDO) is to institutionalize Women's Affinity Groups and other platforms for women's economic empowerment and enhance the economic opportunities of unbanked women. To accomplish the PDO, the project will create and strengthen new and existing WAGs with a strong livelihood intervention to enhance household income. Improved access to finance through livelihood grants that will enable women to meet specific life cycle needs and mitigate food, education, and health expenses in due course.

The components of the NFWP-SU are three (3), including:

Component 1: Building Community Institutions (US\$168 million)

This component aims to leverage existing practices of mutual help among women to address gender inequalities and create economic opportunities. Specifically, activities under this component will support the creation of WAGs that will build on practices of mutual help and leverage these as an institutional

¹ The was prepared using the World Bank Safeguard Policies

platform to support access to finance, enhance women's voice and agency, and drive behavior change. Activities under this Component will be implemented through three subcomponents: (i) Women Affinity Groups and Federations; (ii) Platforms for Behavior Change in Health, Sanitation, and Climate Adaptation, and (iii) Influencing Social Norms.

Component 2: Livelihood Program (US\$272 million)

This component aims to facilitate improvement in the livelihood opportunities of WAG members through the CIF and promotion of LCs. Beneficiaries would include PGs, CIGs, FAs, and PCs, among others. The aim of this component is to (i) finance income-earning productive assets for WAG members and (ii) provide low-carbon, climate-resilient production enhancement services and market linkage by supporting LCs across farm and nonfarm activities. It will also finance the formation or identification of LCs that include WAG members and support them through grants to engage in aggregation and establishing LCs in selected climate-smart value chains. This component will consist of three subcomponents: (i) Community Investment Fund, (ii) Support to Livelihood Collectives, and (iii) Technical Assistance and Innovations for Livelihoods Programs.

Component 3: Project Management, Monitoring and Evaluation, and Learning (US\$50 million)

This component will finance project management, monitoring, evaluation, and learning at both federal and state levels and will build government capacity to facilitate the implementation of Project activities and consequently ensure sustainability.

Project management and coordination at federal and state levels include general project management as well as procurement, financial management, environmental and social risk management, and a grievance redress mechanism (GRM). In addition, the component will include TA to the FPCU to provide quality assurance support to the implementing states, helping them to manage inputs and requests from the large number of expected State Project Coordinating Units (SPCUs), as well as provide quality assurance to ensure fidelity of the NFWP model across the states. Under project coordination, FMWA and SMWAs will be strengthened and encouraged to work with other ministries, departments, and agencies (MDAs) and key partners for effective implementation of the project (e.g., multi-sectorial institutions and agencies, development partners, CBN, and financial institutions).

To support the management of GBV risks associated with WAG formation and women's participation in WAGs, this component will also continue to finance the mapping of GBV service providers and the development of referral pathways in new states that can be used by the Project to address GBV/SEA/SH issues and complaints.

ES 4: Justification for Preparing an SEP

The preparation and implementation of Stakeholder Engagement Plan (SEP) is a requirement under the World Bank Environmental and Social Standard (ESS)¹⁰. The SEP addresses the need for open and inclusive engagements/dialogues with stakeholders affected or likely to be affected by the project (project affected parties), and other interested parties. It 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. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance among the people and community hosting such project, contribute significantly to overall successful project design and implementation.

ES 5: Methodology

In preparing this SEP, literature review and high-level stakeholder consultations were explored. Literature review involved the review of the Environmental and Social Management Framework (ESMF) of the existing Nigeria for Women Project (NFWP), the Concept Note of the present Nigeria for Women Scale-Up project (NFWP-SU), World Bank Environmental and Social Framework (ESF) and the Stakeholder Engagement Plan of ACREsAL Agro-Climatic Resilience in Semi-Arid Landscapes (ACReSAL) Project amongst others. Similarly, there was a stakeholder consultation with all the participating states including management staff of the state steering committee such as the Ministries of Finance, Budget and Planning, Women Affairs and Social Development, Environment, Agriculture, Land and Survey, and Water Supply & Sanitation.

The interface was helpful not only to inform the stakeholders about the project development objectives of NFWP-SU and benefits, but also to enlighten the stakeholders on the imperative of the preparation and implementation of this Stakeholder Engagement Plan, and the role each Ministry or agency will play.

ES 6: Stakeholders Identification and Analysis

Details are contained in Section 3.3 of this report. Identified Stakeholders were classified into three groups namely:

1. Influential Parties: Ministries, departments and agencies (MDAs), Traditional leaders and NGOs/CSOs.
2. Affected/Interested parties: Host Communities, Community members, Women Affinity Groups.
3. Disadvantaged or vulnerable individuals or groups: Elderly people above the age of 65, female headed Households (widows), Persons with disabilities, People living in extreme poverty, internally displaced persons (IDPs) and orphans.

Impact of Stakeholders on the project was assessed and documented.

ES 7: Stakeholder Engagement programme. The nature, scope, and frequency of stakeholder engagement with each group of identified stakeholders will be a function of activities within the project cycle. Stakeholders will be engaged periodically in demonstration of accountability, inclusiveness and participation which is aimed at ensuring low risk to the project while optimizing the benefits.

Table ES 1: Engagement methods to be adopted are as follows

Consultation Methods	Targeted Stakeholders
Public Consultations	Communities, Traditional/Faith based Leaders and MDAs, NGOs
Focus group discussions (FGDs)	WAGs, youth groups, disabled or vulnerable groups.
Face to face meetings and workshops	MDAs, NGOs, Traditional rulers,
Correspondances (Radio Jingles, Phone, Emails)	All stakeholders especially those in the rural areas
In-depth interview	Community leaders, opinion leaders, heads of organizations and MDAs
Project Website	All stakeholders with internet access
Advocacy and sensitization using Information, Education and Communication (IEC) materials including banners, signposts and flyers	All stakeholders especially those in the rural areas
Virtual meetings	MDAs (Formal Stakeholders)
Feedback information box	All stakeholders especially those will prefer confidentiality

Table ES 2 Showing method of consultation of vulnerable persons

Category of Vulnerable Person	Method of Consultation and Consideration
Elderly	Recognize their organization and leadership, Focus Group meetings, Assisted transport to meetings
Female headed households (widows)/ Women	Recognize and respect cultural norms. Additional separate Focus Group meetings will be held for women. Where women are in seclusion, female consultants and specialists may be assigned to consult with them in the designated areas.
Orphans	Additional Focus Group meetings Assisted Transport to meetings

The stakeholder engagement process as contained in Table 4.2 of the main document clearly indicates: a) the project stage at which the engagement should take place, b) the objective of the engagement, c) key activities to be undertaken at each project’s stage, d) the target stakeholder (s) to be engaged, e) the platform of the engagement, f) the frequency and location of the engagement and, g) responsible person/agency. Where possible, stakeholder engagement plan for the project shall utilize already existing engagement structures within the national/country system - such as the communal meeting.

ES 8: Information Disclosure

Documents disclosed shall be in English language and will be released for public review as provided for in Section 4.5 of this report. Translation of the executive summaries in relevant local languages will be made available in the designated community centers. This is to ensure that language barriers do not create communication breach thereby failing to carry all stakeholders along. Other communication with stakeholders especially in the rural communities including radio jingles, leaflets, pictograms, and brochures will be in local languages and will be made accessible to the relevant communities.

ES Table 3: Modality for information disclosure for stakeholders

Stakeholders	Project Information Shared	Means of communication/ disclosure
MDAs	<ul style="list-style-type: none"> • ESF Documents including ESIA, ESMP, RPF, RAP SEP and other relevant documents. • Regular updates on Project development; including proposed design / livelihood enhancement and support programmes /community. empowerment program. • Additional types of Project’s information if required for the purposes of regulation and permitting. 	<ul style="list-style-type: none"> • Dissemination of hard copies • Project status reports • Meetings and round tables. • Virtual Meeting online, webinar • Project website
NGOs	<ul style="list-style-type: none"> • ESF Documents including ESIA, ESMP, RPF, RAP SEP and other relevant documents. • Public Grievance Procedure. • The duration of proposed project activities. • The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate. • GRM in place • Regular updates on Project development including proposed design / livelihood 	<ul style="list-style-type: none"> • Electronic publications and press releases on the Project website. • Dissemination of hard copies at designated public locations. • Press releases in the local media (Radio Jingles). • Consultation meetings – village meetings/ Association meetings. • Information leaflets and brochures. • Virtual Meetings

	enhancement and support programmes /community.	
Other affected/interested persons	<ul style="list-style-type: none"> • ESF Documents including ESIA, ESMP, RPF, RAP SEP and other relevant documents. • Public Grievance Procedure. • The duration of proposed project activities. • The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate. • GRM in place. • Regular updates on Project development including proposed design / livelihood /community. 	<ul style="list-style-type: none"> • Electronic publications and press releases on the Project website. • Dissemination of hard copies at designated public locations. • Press releases in the local media (Radio Jingles). • Consultation meetings – village meetings/ Association meetings. • Information leaflets, pictograms and brochures which shall be translated to the local language obtainable in the localities. • Separate focus group meetings with vulnerable groups, during Stakeholder Consultations.

ES 9: Grievance Redress Mechanism

The NFWP-SU will rely on the grievance mechanism operationalized under the NFWP. As found effective within the NFWP-SU structure, diverse methods for reporting grievances that are culturally appropriate are to be used as they permit for self-identified, confidential, or anonymous procedures (professional letter writers, suggestion / PMIS, Email, Toll-free lines, social media etc.).

ES 10: Monitoring and Reporting

The SEP will be periodically revised and updated as necessary in the course of project implementation in order to include any new identified stakeholders and to ensure that the information presented herein is consistent and is the most recent, and that the identified method of engagement remains relevant and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.

ES 11: Funding and Implementation Arrangement

The cost of funding activities of SEP is N5,710,000 (Five Million, Seven Hundred and Ten Thousand Naira). Costs associated with the implementation of SEP’s activities will be covered from subcomponent 1.1 resources. The FPCU in the FMWA will be responsible for the overall coordination of the Project and will also implement selected Project activities at the federal level. The FPCU will coordinate Project implementation and performance monitoring using the PIM and will be responsible for communication with the World Bank and other partners. Project activities in participating states will be supervised and

coordinated by the SPCU and implemented by the WFs. There shall be a project coordination desk at the selected LGAs. This LGA coordination shall ensure supervision and monitoring of safeguards and report to the Social Safeguard Officer at the SPCU.

CHAPTER 1: PROJECT DESCRIPTION

1.1 Background

The World Bank is supporting the Federal Government of Nigeria (FGN) to implement the Nigeria for Women Scale-Up Project (NFWP-SU) aimed at addressing inequalities in women's access to jobs and control over productive assets through the platform of Women Affinity Groups (WAGs). The proposed project will build on the FGN's policies and programs that support women's economic empowerment, leveraging partnerships, particularly with the private sector and creating an enabling environment for women to overcome institutional failures (including market) and barriers to enhancing productive livelihoods and socioeconomic advancement in personal, technical, financial, and entrepreneurial skills. The proposed seven (7) years term NFWP-SU is to be supported with an initial financing from the World Bank to the tune of \$500 million. NFWP-SU will be implemented in targeted communities across all participating states in Nigeria including Abia, Akwa-Ibom, Anambra, Bayelsa, Benue, Borno, Cross River, Delta, Gombe, Jigawa, Katsina, Kebbi, Kogi, Lagos, Nasarawa, Niger, Ogun, Oyo, Plateau, Sokoto, Taraba, Yobe and Zamfara with the possibility of more states joining.

The NFWP-SU project builds on the Nigeria for Women (NFWP) (P161364) Women Affiliation Group (WAG) model, which has been implemented in six states (Abia, Akwa Ibom, Kebbi, Niger, Ogun, Taraba), providing support to over 400,000 direct beneficiaries through the formation and strengthening of 19,200 WAGs. In about two years, these WAGs have saved about N2.6 billion (US\$6 million or about US\$315 per group), with a significant percentage of these funds in circulation as loans at any given time. The beneficiary coverage under this Scale-Up Program is estimated at 3.9 million households, representing about 19.5 million individual direct beneficiaries, 170,500 functional WAGs, and 9,500 WAG federations. The Project will also have an indirect impact on men and boys in each community who will benefit from community activities.

WAGs are community-based women-only groups that come together to address their common problems. Members also engage in savings and lend their savings to one another to support increased incomes and improved livelihoods. In addition to the standard savings approach, the NFWP WAG model includes training in financial basics, business skills, and gender and life skills. Grants may be provided to both individuals and livelihood collectives. WAGs are trained and supported by ward facilitators (WFs) for the whole of their first savings cycle (9–12 months), after which they begin to manage their savings and loan meetings independently.² By the time they have completed their first savings cycle, WAGs are well-cemented groups in the community that often go beyond savings and loans among members to carrying out

community service projects, such as using some of their Social Fund³ to support community health centers or leading sanitation efforts in their local government areas (LGAs). It is these mature WAGs that have the potential to serve as powerful platforms for leveraging behavior change to improve development outcomes at the household and community levels.

The proposed Project will be following a graduated approach to ensure beneficiaries' readiness to access and deploy resources offered by the Project. Initial efforts will focus on the mobilization of women in target communities into WAGs at the local level, and their strengthening. Subsequently, the Project will support economic opportunities through livelihood enhancement grants to WAGs and livelihood collectives.

Thereafter, the Project will support promotion of WAG federations. The federations would (i) support WAGs to achieve economies of scale, (ii) support WAGs to reduce transaction costs, (iii) serve as a platform for promoting value-added non-financial services to WAG members, (iv) reduce the cost of promoting new WAGs, and (v) increase the level of WAGs' financial discipline and accountability. The federations would not take on financial intermediation activities.

The Project will target women who are currently underserved by existing programs, particularly women engaged in informal, unipersonal, small-scale businesses and small-scale farming. Targeting women who are already economically active enables them to have the necessary funds to engage in savings and loans with other WAG members. Within this target population, the Project will seek to explicitly reach key marginalized and vulnerable groups—including women with disabilities and displaced women—using tailored strategies appropriate to their context.

1.2 Project Components

The project is structured around three components, namely:

Component 1: Building Community Institutions (US\$168 million)

This component aims to leverage existing practices of mutual help among women to address gender inequalities and create economic opportunities. Specifically, activities under this component will support the creation of WAGs that will build on practices of mutual help and leverage these as an institutional platform to support access to finance, enhance women's voice and agency, and drive behavior change. Activities under this Component will be implemented through three subcomponents: (i) Women Affinity Groups and Federations; (ii) Platforms for Behavior Change in Health, Sanitation, and Climate Adaptation, and (iii) Influencing Social Norms.

Component 2: Livelihood Program (US\$272 million)

This component aims to facilitate improvement in the livelihood opportunities of WAG members through the CIF and promotion of LCs. Beneficiaries would include PGs, CIGs, FAs, and PCs, among others. The aim of this component is to (i) finance income-earning productive assets for WAG members and (ii) provide low-carbon, climate-resilient production enhancement services and market linkage by supporting LCs across farm and nonfarm activities. It will also finance the formation or identification of LCs that include WAG members and support them through grants to engage in aggregation and establishing LCs in selected climate-smart value chains. This component will consist of three subcomponents: (i) Community Investment Fund, (ii) Support to Livelihood Collectives, and (iii) Technical Assistance and Innovations for Livelihoods Programs.

Component 3: Project Management, Monitoring and Evaluation, and Learning (US\$50 million)

This component will finance project management, monitoring, evaluation, and learning at both federal and state levels and will build government capacity to facilitate the implementation of Project activities and consequently ensure sustainability.

Project management and coordination at federal and state levels include general project management as well as procurement, financial management, environmental and social risk management, and a grievance redress mechanism (GRM). In addition, the component will include TA to the FPCU to provide quality assurance support to the implementing states, helping them to manage inputs and requests from the large number of expected State Project Coordinating Units (SPCUs), as well as provide quality assurance to ensure fidelity of the NFWP model across the states. Under project coordination, FMWA and SMWAs will be strengthened and encouraged to work with other ministries, departments, and agencies (MDAs) and key partners for effective implementation of the project (e.g., multi-sectorial institutions and agencies, development partners, CBN, and financial institutions).

To support the management of GBV risks associated with WAG formation and women's participation in WAGs, this component will also continue to finance the mapping of GBV service providers and the development of referral pathways in new states that can be used by the Project to address GBV/SEA/SH issues and complaints.

1.3 Justification for Preparing an SEP

The preparation and implementation of the SEP is a requirement under the World Bank ESS10. SEP addresses the need for open and inclusive engagements/dialogues with stakeholders affected or likely to be affected by the project (project- affected parties), and other interested parties. It is a critical process that identifies the procedures for the project 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 the project, commencing as early as possible. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance community-level project acceptance and contribute significantly to overall project design and implementation.

1.4 Objectives of the SEP

The objectives of the Stakeholder Engagement Plan 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 describe the stakeholder engagement process.

1.5 Expected Output

The expected output of this SEP includes but is not limited to:

1. Program described and its potential environmental and social impacts and risks as known at the time of preparation of this plan;
2. Stakeholder identified, mapped and analysed;
3. Framework for Stakeholder Engagement developed;
4. Information to be disclosed and method of disclosure set out.
5. Framework for Monitoring and Implementation developed.

1.6 Methodology for Preparing the SEP

In preparing this SEP, literature review and high-level stakeholder consultations were explored. Literature review involved the review of the Environmental and Social Management Framework (ESMF) of the existing Nigeria for Women Project (NFWP), the Concept Note of the present Nigeria for Women Scale-Up project (NFWP-SU), World Bank Environmental and Social Framework (ESF) and the Stakeholder Engagement Plan of ACRESAL amongst others. Similarly, there was a stakeholder consultation with all the participating states including management staff of the state steering committee such as the Ministries of Finance, Budget and Planning, Women Affairs, Environment, Agriculture, Land and Survey, and Water Supply & Sanitation.

The interface was helpful not only to inform the stakeholders about the project development objectives of NFWP-SU and benefits, but also to enlighten the stakeholders on the imperative of the preparation and implementation of this Stakeholder Engagement Plan, and the role each Ministry or agency will play.

CHAPTER 2: STAKEHOLDER ENGAGEMENT REGULATORY FRAMEWORK

2.1 Introduction

This chapter is concerned with the review of national and international legal and regulatory frameworks and policies which underpin and regulate citizen's freedom of information, citizenship engagement, disclosure of public information and adequate response to concerns and grievances raised by the public on key governance and decision actions. These legal frameworks as reviewed under this section include the World Bank's Environmental and Social Standard 10 (ESS10), Constitution of the Federal Republic of Nigeria (1999), the Freedom of Information Act, 2011, the EIA Act 86 of 1992 and the Urban and Regional Planning Act, Cap N138, 2004.

2.2 National Legal Provisions for Citizen Engagement

2.2.1 Constitution of the Federal Republic of Nigeria (CFRN) 1999 (as amended)

The CFRN in Chapter Two provides for Fundamental Objectives and Directive Principles of State Policies which are the obligations accruing to the State with respect to its citizens. Section 16 provides that the State shall harness resources and control the National economy in such a manner as to secure the maximum welfare, freedom and happiness of every citizen on the basis of social justice and equality of status and opportunity. It goes further in Section 20 to provide that the State shall protect and improve the environment and safeguard the water, air and land, forest and wildlife of Nigeria. In Chapter Four, Section 39 (1) it is stated that every person shall be entitled to freedom of expression, including freedom to hold opinions and to receive and impart ideas and information without interference.

2.2.2 The Freedom of Information Act⁴

This Act derives its powers from Section 39 of the Constitution of the Federal Republic of Nigeria. It applies not only to public institutions but also to private organizations providing public services, performing public functions or utilizing public funds⁵. 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. Section 1 of the Act provides that every citizen whether adult or minor is entitled to have access to any records under the control

4 Freedom of Information Act, 2011, Laws of the Federation of Nigeria. Electronically available at Freedom of Information Act (cbn.gov.ng)

5 Section 1 and Section 2 (1)

of the government or any public institution. Section 1(3) of the Act allows an applicant who has been refused information by a public institution, to institute proceedings in Court (Federal or State High Court) to compel the public institution to release the information sought.

Obligations that the Act imposes on Institutions include:

1. A description of the organization and responsibilities of the institution including details of the programmes and functions of each division, branch and department of the institution.
2. A list of all classes of records under the control of the institution in sufficient detail to facilitate the exercise of the right to information under this Act, and manuals used by employees of the institution in administering or carrying out any of the programmes or activities of the institution.
3. Description of documents containing final opinions including concurring and dissenting opinions as well as orders made in the adjudication of cases.
4. A list of – files containing applications for any contract, permit, grants, licenses or agreements; reports, documents, studies, or publications prepared by independent contractors for the institution, and materials containing information relating to any grant or contract made by or between the institution and another public institution or private organization.
5. The title and address of the appropriate officer of the institution to whom an application for information under this Act shall be sent, provided that the failure of any public institution to publish any information under this subsection shall not prejudicially affect the public's right of access to information in the custody of such public institution.

*All public institutions shall make available any of the records as listed above and as requested by the stakeholders within a period of 7 days of the request.*⁶

2.2.3 Environmental Impact Assessment Act

This act provides guidelines for activities for which EIA is compulsory (such as mining operations, road development, coastal reclamation involving 50 or more hectares, Large Agricultural Projects 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. For the purpose of public access to information, Section 57 of the Act requires Agencies to maintain a public registry in respect of a project. The registry shall contain all records and information

⁶ Section 4.

produces, collected or submitted with respect to the environmental assessment of the project, including any report relating to the assessment and any comments filed by the public in relation to the assessment. The Act also makes it compulsory for project proponents to disclose EIA reports through the Federal Ministry of Environment to all stakeholders for their easy accessibility and inputs. This is usually carried out through advertisement in local dailies for 21 working days and through display of such Documents at various designated Centers close to the project area such as the Local Government Headquarters and Community Town Halls.

2.2.4 Urban and Regional Planning Act, Cap N138, 2004

This Act 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.

2.3 World Bank Environmental and Social Standard on Stakeholder Engagement

The World Bank's Environmental and Social Standard¹⁰ (Stakeholder Engagement and Information Disclosure ⁷) under the Environmental and Social Framework (ESF), recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice”

Specifically, the requirements set out by ESS10 are the following:

- 1. 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.*
- 2. Borrowers will engage in meaningful consultations with all stakeholders.*
- 3. 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.*
- 4. 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.*

⁷ Electronically available at <https://www.worldbank.org/en/projects-operations/environmental-and-socialframework/brief/environmental-and-social-standards>

5. *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.*
6. *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.*

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.

CHAPTER 3: STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Introduction

Identification of Stakeholders is a critical task towards a successful stakeholder engagement planning, because it is the foundation upon which interfaces, communication and synergies are built. It is on the premise of stakeholder profiling and identification that the needs, expectations, and priorities of the stakeholders are known and mainstreamed into the project design. Therefore, stakeholders were identified through a categorized profiling as detailed in the sub-section below:

3.2 Categorization of Stakeholders

Stakeholders were identified through review of project documents of the NFWP-SU and further through consultation with Federal Project Coordinating Unit and relevant state MDAs (those that are part of the NFWP-SU steering committee).

Stakeholders identified for the NFWP-SU are categorized as follows:

1. Beneficiary Parties
2. Affected Parties
3. Disadvantaged / Vulnerable Individuals or Groups
4. Interested Parties

3.2.1 Beneficiaries

For the purpose of this SEP, the scope of beneficiaries is restricted to the 400,000 direct beneficiaries across the targeted 19,200 WAGs including women engaged in informal, unipersonal, small-scale businesses and small-scale farming.

3.2.2 Affected Parties

Project activities under component 2 are likely to affect jointly owned collective assets and will not significantly affect residential and business premises / livelihood, individual and communal land used for grazing and smallholder farms and may not result in major land acquisition / temporary restriction of access to homesteads, businesses, and communal lands.

With the above in mind, the project will take precautionary measures to identify those who are likely to be affected adversely by project activities if land take and restriction become an unavoidable option as follows:

1. Host Communities in project area
2. Land owners

3. Crop farmers
4. Livestock and fish farmers
5. Farmers associations
6. Women Affinity Groups (Farmer Groups, Traders, Professionals, etc.)
7. Community Associations and Interest Groups
8. Internally displaced persons (IDPs)/ migrants.

3.2.3 Disadvantaged/Vulnerable Individuals or Groups

This category of Stakeholders are people who may by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status, be more adversely affected by the project activities than others. The vulnerable or disadvantaged groups classified in the context of this project, are:

1. Elderly people above the age of 65;
2. Female headed Households /widows;
3. Persons with disabilities;
4. People living in extreme poverty;
5. Orphans;
6. Internally Displaced Persons (IDPS) / migrants

This NFWP-SU recognizes that disadvantaged or vulnerable persons or groups require special attention in order to participate adequately in the project process and benefits; and to this end, has designed in this SEP specific measures and assistances aimed at the facilitation of their participation in the project-related decision making so that their awareness of, and input to the overall process are commensurate to those of the other stakeholders. These measures are detailed in **section 4.4** of this SEP.

3.2.3 Interested Parties

Under this are Stakeholders who may not be directly or indirectly impacted by the project, but have the potential interest to influence the project outcomes via their statutory functions and mandates or other factors. They include Ministries, Departments and Agencies with statutory roles in the implementation of NFWP-SU project in the various participating states. They are as follows:

1. Ministry of Women Affairs and Social Development
2. Office of the State Governor
3. Ministry of Finance
4. Ministry of Environment
5. Ministry of Agriculture

6. Ministry of Water Resources
7. Ministry of Education
8. Ministry of Land and Survey
9. Ministry of Local Government Affairs
10. Community-Based NGOs
11. Ministry of Works
12. Traditional Leaders
13. Women Affinity Groups
14. Faith- based / religious leaders

3.3 Stakeholder Mapping and Analysis

The process of stakeholder mapping and analysis began with the review of the project documents namely, the concept note of the NFWPSU, the ESMF of the NFWP, the project appraisal document and through consultation with the federal project coordinating unit. Similarly, virtual consultation held with all the participating states' steering committees and state project coordinating units on 23rd November 2022 were helpful in profiling the roles, capacities and influences of the participating MDAs. The summary of consultations held with the stakeholders is annexed to this document as **Appendix 2**. The following are key takeaway from the consultation:

- The stakeholder's engagement conducted on 23 November 2022 discussed the social legislation/framework as it relates to child right and women violence. During the engagement, stakeholders confirmed that child right and violence against women are legislated in some of the States, For example Nasarawa have domesticated the Child Rights Act CRA, 2003), and the Violence Against Persons Prohibition Act (VAPP, 2015). Participants stated that participating States will be expected to adhere to similar principles. The scale-up project will take advantage of the existing GBV Action Plan and Accountability Response Framework and practices under the original project as well as State level legislations and make the required updates to align with ESF requirements and Bank directives.
- Under the NFWP, a Security Specialist was engaged at the Federal level to (a) identify security risks and proffer solutions to them, (b) advise project management on all safety and security-related matters, ensuring the systemic application of safety and security management policies and procedures, and (c) train staff on security-related topics while ensuring those policy guidelines are understood, adopted, and implemented across the project States. The Security Specialists' role will

be expanded to ensure coverage in the participating states. Participants agreed that the Security Management Plan (SMP) at FPCU level has been effective in addressing issues in the first phase of NFWP and will provide a good foundation for the NFWP SU.

- A part of social issue, social barriers that limits women access to land was discussed during the AF stakeholders' engagement. Participants believe that the major barrier to women's development and land ownership in Nigeria is lack of women empowerment, especially lack of access to finances for purchase of land or land title. Stakeholders unanimously agreed, among the different States, that access to land for women is not a major problem in any of the States if women have the financial means to buy and own land. Stakeholders confirmed that, in the past, some cultural barriers existed, for example, in the Southeast where traditional norms & customs operated for generations were impediments to women's development. This is no longer a barrier, and all participating States will guarantee women right to own land under the project as long as they have the financial means to purchase a piece of land.

Stakeholder engagement is a continuum throughout the phases of this project. It is expected that micro stakeholders will further be identified at the SPCU level and be integrated into the stakeholder engagement plan.

Table 3.1 presents the lists of the stakeholders identified, their profile, interest and role/level of relevance to the NFWP-SU project.

Table 3.1 Stakeholder Matrix showing interest and role in the project

Stakeholder Group	Profile of Stakeholder Group	Interest in the Project	Potential Role/Relevance to the Project
Interested Parties	Office of the State Governor	Influencers	Statutory mandate as Chief executive officer of the State.
	Ministry of Women Affairs and Social Development	Influencers/Implementers	<p>They are the core ministry involved in policy regulation and provision of human resources. They are at the head of project coordination through the Project Coordination Unit.</p> <p>They coordinate activities concerning women in the States.</p> <p>This ministry is also involved in Gender Based Violence related activities.</p>
	Ministry of Finance, Budget & Planning	Influencers	Chairing the Project Steering Committee.
	Ministry of Environment	Influencers/Implementers	<p>Ministry responsible for environmental protection.</p> <p>Co-chairing the Project Steering Committee</p>
	Ministry of Agriculture	Influencers/Implementers	<p>Ministry responsible for managing the Agricultural sector.</p> <p>Member of the Project Steering Committee</p>
	Ministry of Water Resources	Influencers/Implementers	<p>They regulate access to safe and sufficient water. This ministry is responsible for water supply in States including in the rural areas. They need to be informed about project progress.</p> <p>Member of the Project Steering Committee.</p>
	Ministry of Information	Influencers/Implementers	They provide citizens with credible and timely information on government activities, programmes and initiatives.

			Member of the Project Steering Committee
	Ministry of Local Government Affairs	Influencers/Implementers	They have to be engaged to grant access to NGOs prior to engagement with community members. They have to be informed on the progress of the project. Member of the Project Steering Committee
	Ministry of Education/ Nigerian University Commission	Influencers	The Academic can partner with the project to improve capacity and outreach (incl. agro-advisory services) through access to knowledge, advice, networking, training, student internships, visiting experts (e.g. for improving inter-departmental linkages and links to academia), and development of interactive data/knowledge dashboards and e-learning (especially as connectivity improves and to manage disruptions such as COVID-19).
	Community Based NGOs	Influencers	NGOs are involved in ensuring transparency and accountability, creating awareness, maintaining communication with community
	Traditional Leaders/Faith Based Leaders	Influencers	Traditional leaders need to be involved on the progress of the project in their host communities as they are key in the dissemination of information and grievance management
	Ministry of Works	Influencers	Ministry is charged with the responsibility of providing technical services such as design, construction and maintenance of State Roads. They need to be engaged to give necessary statutory authorizations. Member of the Project Steering Committee
Beneficiary & Affected Parties	<ul style="list-style-type: none"> WAGs; 	These Stakeholder	WAGs and other direct beneficiaries will be consulted, trained and

	<ul style="list-style-type: none"> • Women in Cooperatives; • Women Fishers Association; • Women farmer Groups • Women Traders • Professionals, Host Communities • Women Livestock farmers • Community members and Interest Groups 	groups are either direct beneficiaries from the program or are adversely impacted by the project.	sensitized on how to optimize the benefits of the project Potential Project Affected Persons (PAPs) shall be consulted using the plan outlined in the Stakeholder Engagement Plan. This will be done throughout the project cycle. To ensure that their views are incorporated in the implementation and execution of the project.
Disadvantaged or Vulnerable Groups	<ul style="list-style-type: none"> • Elderly people above the age of 65; • female headed Households/widows • Persons with disabilities; • Internally Displaced Persons; • People living in extreme poverty; and • orphans 	These Stakeholder groups are directly impacted by the project. They are important beneficiaries of the project.	This Stakeholder Group may be more adversely affected by the impact of the project than other Stakeholder groups. They will be consulted using the plan specifically outlined in the Stakeholder Engagement Plan. This will be done throughout the project cycle. To ensure their views are incorporated in the implementation and execution of the project.

3.4 Stakeholder Analysis

The analysis carried out in Table 3.2 depicts the identified Stakeholders, their level of interest, nature of relationship with the project and influence on the project. The purpose is to have a clear-cut understanding of the powers and influence of the respective stakeholders which may affect projects outcome and sustainability on one side, and to also know the interest of stakeholders that lie on the critical path of project implementation with a view to deepening dialogue with the concerned stakeholders to ensure they are prioritized and mainstreamed early into the project work plan.

Influence in this SEP is defined by the stakeholder’s decision-making powers, in the sense of the stakeholder’s ability to make decisions that determine the project outcomes and process of implementation of the project.

Power has to do with the capacity of the stakeholders to impact the implementation of the project in relation to the force they can deploy in the context of their stake holding. This force may be positive or negative.

In determining strategy for engagement of stakeholders' base on their interest and influence in the project outcomes, three classifications are used, namely: High, Medium, and Low as further described below.

High

High Influence stakeholders will be kept informed, engaged, and consulted throughout the duration of the project. This will be carried out by:

1. Involving these most influential stakeholder (s) in NFWP-SU governance decision- making bodies through committees (including the steering committee) and,
2. Engaging and consulting them less regularly and as needed through the technique and platform provided in **Table 4.2** of this SEP.

Medium

Considering that this group is lower on the decision-making scale than the High Influence Stakeholders, adequate care will be taking to ensure that they are given a voice and their opinions are included in project development and implementation. Medium Influence Stakeholders will be carried along, kept informed and monitored throughout the duration of the project. The plan is to ensure that this class of stakeholders are adequately engaged through consultations and feedback channels to ensure that they are carried along in the project development and implementation.

Low

This group is lower on the decision-making scale than the High and Medium Influence Stakeholders. Even though their influence in decision making is low, these stakeholders have high interest in the project outcome. Stakeholders in this category are at the grass root level; including host community members, WAGs, vulnerable persons and community associations who without focused assistance, may not be able to participate in the decision-making process of the project. The techniques tabulated in Table 4.3 will be engaged as further effort to ensure that the vulnerable among this category are adequately engaged. The plan is to fully engage this group and apply all efforts to ensure that they are satisfied and fully informed of the project development at all times. The project will maintain this group's interest in the NFWP-SU. This will be done by:

1. focusing efforts on these groups of stakeholders throughout the project cycle;
2. involving these groups in regular consultations throughout the project cycle;
3. ensuring adequate use of the grievance redress and feedback channels to engage and keep them satisfied; and
4. keeping them in the loop on decisions that will influence design and implementation.

Table 3.2 Showing Stakeholder Analysis/Profiling

NO	Stakeholders	Influence	Nature of relationship with Project	Interest
1	Office of the State Governor	High	Influencers	High
2	Ministry of Women Affairs and Social Development	High	Implementation	High
3	Ministry of Finance	High	Implementation	High
4	Ministry of Environment	High	Implementation	High
5	Ministry of Agriculture	High	Implementation	High
5	Ministry of Water Resources	High	Implementation	High
6	Ministry of Information	High	Implementation/Awareness	High
7	Ministry of Local Government Affairs	High	Access Support	High
8	Community Based NGOs	Medium	Community Engagement, Transparency, Accountability.	High
9	Traditional Leaders/Faith Based Leaders	High	Community Engagement, Transparency, Accountability.	High
11	Ministry of Works	High	Support	High
12	<ul style="list-style-type: none"> • WAGs; • Women in Cooperatives; • Women Fishers Association; • Women farmer Groups • Women Traders • Professionals, Host Communities • Women Livestock farmers • Community members and Interest Groups 	Low	Direct beneficiaries and impacted parties	High
13	Vulnerable / Disadvantaged Groups	Low	Directly impacted	High

CHAPTER 4: STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Introduction

This section articulates the broad programmes, events and activities of the NFWP-SU for which stakeholders will be consulted, enlightened and/or sought for, to make contributions that will advance the realization of the project development objectives. Notwithstanding the a priori programs detailed in this SEP, it is not inconceivable to have occasions to consult with stakeholders in impromptu circumstances.

4.2 Purpose and Timing of Stakeholder Engagement Program

The essence of the stakeholder engagement program and timing is to ensure that stakeholders are provided with timely, relevant, workable, and accessible information about the progress status of the project, objective and measures for achieving them. Consulting with stakeholders in a culturally appropriate and timely manner ensures inclusiveness, stakeholder buy-in, eliminates wrong perception about the project and helps to build confidence and overall project performance.

Engagement with Stakeholders is throughout the life cycle of the project and this SEP provides a system necessary for preparation, planning, participation and discharge of roles or functions in a manner that does not duplicate or clash with other parties' roles. This also minimizes resources spending and channel them to areas of deficit and demand.

4.3 The nature, scope, and frequency of stakeholder engagement

There are many determinants of the nature, scope and frequency of stakeholder engagement. All stakeholders may not be engaged at the same time or in equal frequencies. After the initial entry or introduction of project, subsequent engagements of stakeholders may be determined by the project phase and relevant parties that are affected, interested or influential to the purpose being targeted. Similarly, the scope and frequency of engagement should be a function of the goal of the stakeholder engagement per time and the factors around the target stakeholders, such as their level of education, cultural factors, insecurity consideration, COVID-19 protocol and restriction, number of populations expected, appropriate channel of engagement and availability of resources.

4.4. Expected Outcome / Purpose of the Engagement Process

The engagement process as designed is envisaged to facilitate the following outcomes:

- Strengthened development outcomes through effective partnerships.
- Plan of action that clearly identifies the means and frequency of engagement of each stakeholder

- Identified roles and responsibility of all stakeholders and their participation in the complete project cycle ensured
- Appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format taking special consideration for the disadvantaged or vulnerable groups.
- Recognized and effectively addressed potential constraints and conflicts that could affect effectiveness
- Capacity building program for Stakeholders as well as implementing agencies.
- Provision of meaningful access to discussion and decision making in development processes.
- Adequate feedback and monitoring mechanism to ensure the project is attaining its intended results and detects potential unintended consequences
- An avenue for information disclosure.

4.5 Management of Stakeholder Participation and Expectations

Management of stakeholder participation is crucial to participation, significance, and outcome of the goal of such engagement. Project implementers in NFWP-SU will ensure that ethical factors, cultural influences, political dynamics and sentiments as well as vulnerability and gender factors are considered. In many cases, engaging with affinity groups rather than community wide engagement can be more effective and significant. For example, power dynamics and cultural norms of a local context can affect stakeholders' participation. In communities where women observe 'pudah' (seclusion from public appearance), such women may be cut off from participation if the consultation process does not take into consideration such cultural practices in existence. Also, some cultures forbid women from speaking in the public space if they are gathered with alongside with men. Resolving these issues requires choosing appropriate consultation channels and environment conducive for each targeted segment of the population.

Engaging with minority or sensitive group such as women and the disable may require conducting focused group discussions (facilitated by female officials) to ensure that the women are engaged in a manner that will encourage freedom of participation. Also, SPCUs should ensure that each consultation period adds value and shows milestone at addressing previous concerns and expectations raised by stakeholders. Evidence from consultations on challenges encountered with stakeholder management in host communities show that stakeholders can be bored by incessant consultations especially where expectations are not being met or where project preparation process is perceived as taking lengthy time (Kelechi, 2021).

Therefore, in managing stakeholder expectations, the project shall adopt the following outlook:

- Conduct adequate awareness, sensitization and consultation on the scope, identified risks and impacts of the project and its intended results through means identified in table 4.1;

- Ensure that engagement is devoid of elites hijack;
- Engender transparency through information disclosure as contained in section 4.5;
- Ensure that minority groups, vulnerable groups and gender are consulted separately using culturally appropriate language and medium of communication;
- Locate meetings at locations/venues that are not far from where participants reside, or at least be responsible for logistics and mobilization of participants;
- Engagement events should occur in line with the SEP schedule so that there is clear linkage between engagement activities and the project stages;
- Ensure that engagement is accessible and managed so that it is culturally appropriate, and adequate and timely information and opportunities are provided to all stakeholders to facilitate their involvement.

4.2 Proposed Strategy for Consultation and Feedback Community Entry

This is a process of initiating, establishing and nurturing a relationship with the community with the purpose of securing and sustaining the community's interest, gain support from the community leaders and to ensure establishment of good working relationship and sustainability of the project. This exercise will be carried out by the Social Safeguard Specialist supported by the community-based local NGOs and Communication officer.

Activities involved includes:

1. Ministry of Local Government; Obtain authorization to enter community from the Local Government Ministry / Authority.
2. Visitation to Traditional / religious leaders to intimate them on the project and project objectives. This visitation includes key-in-depth interviews and one on one meetings with local leaders or small group meetings with different leadership segments. It is important to note that a best practice is to communicate with the local leadership first before going to the community. These personal forms of communication set the tone for the project.
3. Community members, Affinity Groups, Marginalized groups: Meeting with community members to inform them about the project and to solicit their views on the project through the process listed in Table 4.1 below.
4. Communication and Feedback: Establish Communication line of feedback with the community through local NGOs and direct access that creates a sense of protection and confidentiality. It is important to note that Project can through dialogue mechanism and feedback obtain useful information from the community members for a range of issues including security, unethical conducts of contractor or project

personnel, perception of minority groups, etc. This information when available can help implementers to redesign their procedure and actions in order to forestall deviations and compromises that can derail the project. In the light of this, SPCUs will expand their information collection channels to include the following:

- Information/suggestion box clearly marked and kept in accessible designated places and well communicated to all stakeholders;
 - Free toll lines should be made available so that community members, the aggrieved and interest persons can call and lodge their information;
 - E-mail and website should be disclosed to the public for the use of persons who find it more convenient to channel their opinions and information.
5. Outreach: Use cultural and language sensitive IEC materials including banners, signposts and flyers to create awareness and sensitization of the project in the communities.

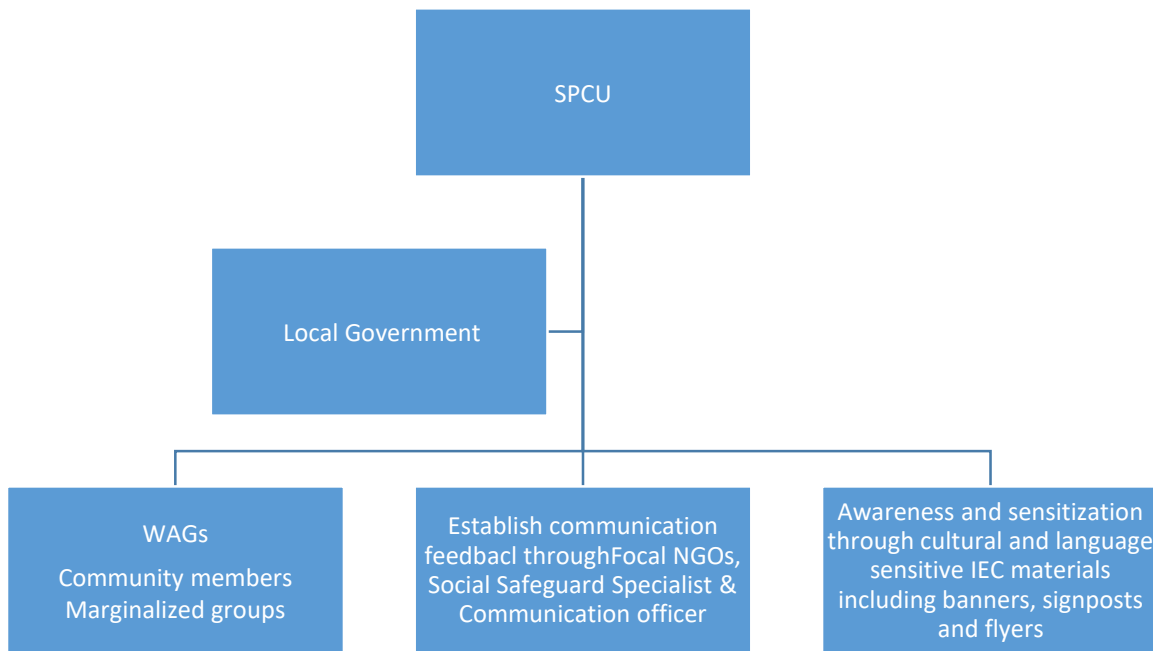


Figure 4.1 Process of Community Entry

4.3 Consultation Methods

The different consultation methods and Stakeholders to which they apply are contained in Table 4.1. Consultations shall be conducted in the local language widely used in the communities. Where this is not the case, proceedings shall be translated to local languages of the communities.

Table 4.1 Consultation Methods

Consultation Methods	Targeted Stakeholders
Public Consultations	Every Stakeholder inclusive of all groups and gender
Focus group discussions (FGDs)	Women affinity groups, youth group, disabled, MDAs, Traditional/Faith based Leaders, minority groups
Face to face meetings and workshops	Government Ministries and Departments, NGOs, Traditional rulers,
Correspondences (Radio Jingles, Phone, Emails) Town hall meetings	Every Stakeholder
Religious meetings, town hall meetings, village meetings	Community members and farmers, Herders etc.
Project Websites	Every Stakeholder with internet access
Advocacy and sensitization through the use of IEC materials including banners, signposts and flyers	Every Stakeholder
Virtual meetings	MDAs (Formal Stakeholders)

To ensure stakeholder participation without the occurrence of stakeholder fatigue, Table 4.2 below provides a plan for engagement. The plan clearly indicates: a) the project stage at which the engagement should take place, b) key activities and objective, d) the target stakeholders to be engaged, e) the platform of the engagement, f) the frequency and location and, g) Facilitators. Where possible, stakeholder engagement plan for the project shall utilize already existing engagement structures within the sub-national system - such as the communal meeting.

Table 4.2: Stakeholder Engagement Action Plan

Project Stage	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Facilitator
Planning and Approval Objective: Disclose relevant project information to stakeholders and solicit their inputs/feedback into ESIA,	1. Project alternatives 2. Scope of the potential impacts and mitigation measures and benefit enhancers 3. Land acquisition process, if required 4. Project environmental and social (E&S) principles 5. Resettlement measures 6. Grievance mechanism Process 7. GBV/SEA	<ul style="list-style-type: none"> • WAGs; • Women in Cooperatives; • Women Fishers Association; • Women farmer Groups • Women Traders • Women Professionals, • Host Communities • Women Livestock farmers • Community members and Interest Groups • IDPs 	Through traditional & religious leaders, village meetings, religious centers, Association meetings, focused group discussions with women, youth and children, GRM, Advocacy and sensitization through the use of IEC materials including banners, signposts and flyers, radio jingles	Monthly or as needed in the host communities.	PCU, E & S Consultants, NGO

Project Stage	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Facilitator
ESMP, RPF, SEP, RAP, ESMP-sub projects, WAGs livelihood action plan	Land acquisition process, if required Resettlement and livelihood restoration options Project scope, rationale and E&S principles Grievance mechanism process	Traditional leaders, Community Based NGOs	Meetings, Joint Public/community meetings with PAPs	As needed	PMU with E & S Team.

Project Stage	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Facilitator
	<p>Project alternatives, Scope of the potential impacts and mitigation measures and benefit enhancers, Land acquisition process, if Required, Project environmental and social (E&S) principles, E&S principles Grievance mechanism process</p>	<p>Office of the State Governor Ministry of Finance, Ministry of Environment, Ministry of Agriculture Ministry of Water Resources, Ministry of Local Government Affairs, Ministry of Education, Ministry of Women Affairs and Social Development Ministry of Works Ministry of Information</p>	<p>Workshops, IEC materials such as project information sheets, social media communication (virtual meetings and WhatsApp groups), written correspondence, radio jingles, one on one advocacy meetings</p>	<p>One at each ESIA milestone and as needed</p>	<p>Project Coordinator (PC), Communication Officer; Social Safeguard Specialist, Other relevant MDAs Consultant</p>
	<p>Present the final ESIA, Environmental and Social Management Plans (ESMP), Resettlement Action Plan and related plans for</p>	<ul style="list-style-type: none"> • WAGs; • Women in Cooperatives; • Women Fishers Association; • Women farmer Groups • Women Traders • Women Professionals, • Host Communities • Women Livestock farmers 	<p>Public Consultation meeting and focused group discussion.</p>	<p>Once when final ESA and related plans are available</p>	<p>Communication Officer; Social Safeguard Specialist, Other relevant MDAs Consultant</p>

Project Stage	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Facilitator
	comments and feedback	<ul style="list-style-type: none"> Community members and Interest Groups IDPs 			
	Present the final ESIA, Environmental and Social Management Plans (ESMP), Resettlement Action Plan draft and related plans	Office of the State Governor Ministry of Finance, Ministry of Environment, Ministry of Agriculture Ministry of Water Resources, Ministry of Local Government Affairs, Ministry of Women Affairs and Social Development Ministry of Education Ministry of Works, Ministry of Information Traditional leaders, Community Based NGOs	Workshops, project social media communication (virtual meetings), one on one advocacy meetings	Once when final ESA and related plans are available	PC, Social Safeguard Specialist; Communication Officer with support from consultants
Preconstruction Objective: Engagement	Present the Construction Contractors Environmental and Social Management Plans (ESMPs) for comments and feedback	<ul style="list-style-type: none"> WAGs; Women in Cooperatives; Women Fishers Association; Women farmer Groups 	Traditional & Religious Leaders, Village meetings, Religious centers,	As required	PC, Project Engineer, Social Safeguard Specialist;

Project Stage	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Facilitator
activities to prepare stakeholders for construction Phase, Present Construction Contractors ESMPs,	Sensitization on risks accruing due to labour influx caused by construction, mitigation measures and on GRM available.	<ul style="list-style-type: none"> • Women Traders • Women Professionals, • Host Communities • Women Livestock farmers • Community members and Interest Groups • IDPs 	Association meetings, focused group discussions with women, youth and children, GRM, Advocacy and sensitization through the use of IEC materials including banners, signposts and flyers, radio jingles.		Communication Officer, Consultants, NGO
Community Livelihood Action Plans and related plans.	Present the Construction Contractors Environmental and Social Management Plans (ESMPs) for comments and feedback	Traditional leaders, Community Based NGOs	Meetings, Joint Public/community meetings with PAPs	As needed	Communication Officer; Social Safeguard Specialist , Other relevant MDAs Consultant
	Present the Construction Contractors Environmental and Social	<ul style="list-style-type: none"> • Office of the State Governor • Ministry of Finance, Ministry of Environment, • Ministry of Agriculture • Ministry of Water Resources, 	Workshops, project social media communication (virtual meetings)	As required	Communication Officer; Social Safeguard Specialist, Other relevant MDAs Consultant

Project Stage	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Facilitator
	Management Plans (ESMPs) for comments and feedback	<ul style="list-style-type: none"> • Ministry of Local Government Affairs, • Ministry of Women Affairs, • Ministry of Education • Ministry of Works • Ministry of Information 			
	Ongoing consultation on and acquisition and resettlement	Project affected persons, families and businesses identified during planning phase.	Face-to-face meetings Joint public/community meetings with PAPs	Monthly (and as needed)	Grievance Redress Committee
Construction Objective: Provide regular updates on construction activities, implement management plans and	Regularly update on construction activities, including key milestones, key changes in the Project design, and monitoring results from the ESMPs, Health and	Traditional leaders, community members, Project affected persons, families and businesses identified during planning phase.	Face-to-face meetings Joint public/community meetings with PAPs	Once a month and as needed Community/beneficiary Perception / satisfaction surveys – annually	Communication Officer; Social Safeguard Specialist, Other relevant MDAs Consultant

Project Stage	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Facilitator
monitor the effectiveness of the plans Handling of complaints in a prompt and effective manner	safety impacts Construction related Safety measures. Disclose and consult on Construction and Contractor activities, hiring preferences, job and business opportunities, training opportunities etc.				
	Update on resettlement and livelihood rehabilitation.	Only project affected persons as identified during the planning stage	Face to face meeting	As needed	Communication Officer; Social Safeguard Specialist, Other relevant MDAs, Site Committee, GRM,
Operation Objective: Maintain constructive	Engagement with stakeholders to maintain good relationships and provide update on the Project progress	Project Affected Persons	Traditional & Religious Leaders, Village meetings, religious centers, Association meetings, GRM, radio jingles, FGDs	As needed	Communication Officer; Social Safeguard Specialist, Other relevant MDAs

Project Stage	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Facilitator
relationships with stakeholders and maintain awareness of environmental and safety practices in the local communities	Manage community issues and monitor community attitudes Complaint handling				
Engagement will focus on day-to-day operation of the Project	Environmental and safety awareness program Emergency preparedness and response Day-to-day engagement with stakeholders to maintain good relationships and provide update on the Project progress.	<ul style="list-style-type: none"> • WAGs; • Women in Cooperatives; • Women Fishers Association; • Women farmer Groups • Women Traders • Women Professionals, • Host Communities • Women Livestock farmers • Community members and Interest Groups • IDPs 	Village meetings, Religious centers, Association meetings, GRM, radio jingles, Brochures, Factsheets, signposts and banners	As needed	NGO to be engaged by SPCU supported by Communication Social Safeguard Specialist

4.4 Proposed Strategy to Incorporate the Views of Vulnerable Groups

Vulnerable groups consist of people who may not be able to access Project information and articulate their concerns and priorities about potential Project impacts owing to certain barriers that disadvantage them. The barriers could be socio-cultural, for example where women are not allowed in the same gathering as men, or to appear or speak in public. Other factors could be related to age or financial constraints. Taking these barriers into account, several measures as contained in **Table 4.3** will be used to remove obstacles to participation for vulnerable groups.

Table 4.3 Method of consultation of vulnerable persons

Category of Vulnerable Person	Method of Consultation and Consideration
Elderly	Recognize their organization and leadership, Focus Group meetings, Assisted transport to meetings
female headed Households (widows)/ Women	Recognize and respect cultural norms. Additional separate Focus Group meetings should be held for women. Where women are in seclusion, female consultants and specialists may be assigned to consult with them in the designated areas.
Orphans	Additional Focus Group meetings Assisted Transport to meetings
People living with disabilities	Recognize their organization and leadership, Focus Group meetings, Assisted transport to meetings
People living in extreme poverty	Assisted transport to meetings
IDPs	Assisted transport to meetings Additional Focus Group meetings

4.5 Proposed Strategy for Information Disclosure

The objective of the information disclosure plan is to ensure that appropriate project information, particularly activities on environmental and social risks and impacts are disclosed to stakeholders in a timely, understandable, accessible and appropriate manner that conforms to national laws (EIA ACT) and World Bank standards. This SEP makes provision for disclosure of safeguard documents to project-affected and other interested stakeholders mapped during stakeholder's identification exercise. The disclosed documents which shall be in English language 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 as follows:

- Ministry of Women Affairs and Social Development
- Ministry of Finance
- Ministry of Environment,
- Ministry of Agriculture
- Ministry of Water Resources,
- Ministry of Local Government Affairs,
- Ministry of Works
- Project Management offices

Translation of the executive summaries in relevant local language and its posting in the designated community centers is expedient to successful stakeholder engagement. This is to ensure that language barriers do not create communication breach thereby failing to carry all stakeholders along.

Electronic copies of the SEP for disclosure will be placed on the website of the World Bank and each implementing agencies. This will allow stakeholders with access to internet to view information about the project 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.

Table 4.4 Information Disclosure Strategy

Stakeholders	Project Information Shared	Means of communication/ disclosure
MDAs	<ul style="list-style-type: none"> ● Safeguard Documents; ● Regular updates on Project development; including proposed design / livelihood enhancement and support programmes /community. empowerment program ● Additional types of Project’s information if required for the purposes of regulation and permitting. 	<ul style="list-style-type: none"> ● Dissemination of hard copies ● Project status reports ● Meetings and round tables. ● Virtual Meeting online, webinar ● Project website
NGOs	<ul style="list-style-type: none"> ● Safeguard Documents; ● Public Grievance Procedure; ● The duration of proposed project activities; ● The proposed stakeholder engagement process 	<ul style="list-style-type: none"> ● Electronic publications and press releases on the Project website. ● Dissemination of hard copies at designated public locations. ● Press releases in the local media (Radio Jingles).

	<p>highlighting the ways in which stakeholders can participate;</p> <ul style="list-style-type: none"> • GRM in place • Regular updates on Project development including proposed design / livelihood enhancement and support programmes /community. 	<ul style="list-style-type: none"> • Consultation meetings – village meetings/ Association meetings. • Information leaflets and brochures. • Virtual Meeting
Community level beneficiaries	<ul style="list-style-type: none"> • GRM in place • Understanding the NFWP • 	<ul style="list-style-type: none"> • Focused group discussions • Information leaflets translated in local languages
Other affected / interested persons	<ul style="list-style-type: none"> • Safeguard Documents; • Public Grievance Procedure; • The duration of proposed project activities; • The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate; • GRM in place • Regular updates on Project development including proposed design / livelihood /community 	<ul style="list-style-type: none"> • Electronic publications and press releases on the Project website. • Dissemination of hard copies at designated public locations. • Press releases in the local media (Radio Jingles). • Consultation meetings – village meetings/ Association meetings. • Information leaflets, pictograms and brochures which shall be translated to the local language obtainable in the localities. • Separate focus group meetings with vulnerable groups, during Stakeholder Consultations.

4.5.1 Timelines

The disclosure process associated with the SEP will be implemented within the following time frame:

Table 4.5 Disclosure Timeline

Activity	Date/Phase
Placement of the SEP in public domain	Prior to date of project appraisal by the WB board
Public consultation meetings with project stakeholders to discuss feedbacks and perceptions about the program	During project preparation stage
Addressing Stakeholder feedback on the disclosure exercise	During project preparation stage and before appraisal

4.5.2 Feedback

The following channels will facilitate feedback on information disclosed, perception about the project and other input:

- The NFWP-SU website for information disclosure will be equipped with an online feedback feature that will enable readers to leave their comments in relation to the disclosed materials. This will allow stakeholders with access to internet to view information about the project and to initiate their involvement in the public consultation process. (Please refer 4.5 on Proposed Strategy for Information Disclosure)
- Feedback will also be received using the email address of the SPCU.
- The stakeholders will also make use of the free toll lines that will be made available by the SPCU to communicate concerns and feedback to the SPCU.

4.6 Future Phases of Project

This NFWP-SU SEP will be domesticated by the participating States and updated by the SPCU to ensure effectiveness of SEP implementation in their respective states.

4.7 Capacity Building and Training for Stakeholder Engagement

Stakeholder engagement is a continuum and runs throughout the project lifecycle; hence, the need to develop adequate capacity. The successful implementation of effective stakeholder engagement will require adequate capacity for the SPCU. Capacity building efforts shall focus on the SPCU who are primarily responsible for the implementation and monitoring of the stakeholder engagement process for the project, as well as other implementing and monitoring partners. The table below presents identified capacity development or strengthening needs for the NFWP-SU SEP.

Table 4.6: Capacity Building Plan

S/N	Capacity	Target Group(s)	Timeline
1	SEP Implementation capacity	SPCU, Community Associations and Focal groups	one during project preparatory phase and another during implementation phase and any other time as may be need induced
2	Facilitation of stakeholder engagement	SPCU, Community Associations and Focal groups	one during project preparatory phase and another during implementation phase and any other time as may be need induced
3	Community-focused awareness creation on Citizens Engagement and Social Accountability	SPCU, Community Associations and Focal groups	one during project preparatory phase and another during implementation phase and any other time as may be need induced

S/N	Capacity	Target Group(s)	Timeline
4	Monitoring of implementation	SPCU, Community Associations and Focal groups	one during project preparatory phase and another during implementation phase and any other time as may be need induced
5	Stakeholder engagement data management	NFWP-SU Safeguards Team, M&E and MIS Team	one during project preparatory phase and another during implementation phase and any other time as may be need induced
6	Management of Grievance during SEP	NFWP-SU Safeguards Team	one during project preparatory phase and another during implementation phase and any other time as may be need induced

4.8 Security Provision during Stakeholder Consultation in Rural Communities

During Stakeholder consultation exercise in the preparation of this SEP (please refer to Appendix 2 on public consultation summary), it was recommended by stakeholders that in building local content in projects and to create a sense of ownership of the project by communities, host communities should actively participate in the project in terms of manpower and provision of technical assistance. This includes provision of security by local security and vigilante.

The above recommendation has been adopted in this SEP. During stakeholder consultation in local communities, the local vigilante will be engaged to provide security. The engagement of local vigilante for the provision of security will be funded by the SPCU using part of their counterpart fund.

CHAPTER 5: FUNDING, COORDINATION AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Overview

The implementation of this SEP would require a multi- sector operation with lead coordination role resting upon the FMOWA. The FPCU in the FMWA will be responsible for the overall coordination of the Project and will also implement selected Project activities at the federal level. The FPCU will coordinate Project implementation and performance monitoring using the PIM and will be responsible for communication with the World Bank and other partners. Project activities in participating states will be supervised and coordinated by the SPCU and implemented by the WFs. There shall be a project coordination desk at the selected LGAs. This LGA coordination shall ensure supervision and monitoring of safeguards and report to the Social Safeguard Officer at the SPCU.

Specific roles of the various institutions and MDAs in the implementation of the SEP and other ESF instruments are detailed as follows:

Table 5.1: Responsible Institutions for SEP and their Roles

Category	Roles & Responsibilities
Federal Project Coordinating Unit (FPCU)	<ul style="list-style-type: none"> • Preparation of RPF that meets the requirement of the World Bank • Responsible for providing technical support to the SPCUs and setting up safeguard and communication units that will have the overall responsibility of providing technical assistance to the SPCUs such as review of TOR, ESMP and RAP reports and implementation of this RPF. • Ensuring that State agencies adhere to the ESS5 guideline of the Bank
SPCU	<ul style="list-style-type: none"> • Responsible for coordination of steering committees • Responsible for funding of SEP, GBV/SEA, GRM, M&E activities and capacity building • Liaises with World Bank and the state government • Approves payments • Sets up grievance redress committees
Federal Government MDAs Ministry of Women Affairs and Ministry of Environment	<ul style="list-style-type: none"> • Provide Policy Guidance, Ministerial Coordination and Institutional Changes regarding Environmental & Social issues of the project through the steering committee • Ensure that the disclosure policy of the government of Nigeria is adhered to by the project.

Category	Roles & Responsibilities
State Ministry of Lands, Survey and Urban Development,	<ul style="list-style-type: none"> • Provide project related policy decisions and guidance regarding land acquisition and compensation • Ensuring compliance at the State Level, on matters of Land Acquisition and compensation and other resettlement issues • Set up a functional Safeguards Unit in the SPCU
SPCU Safeguards Unit	<ul style="list-style-type: none"> • Responsible for preparation of ToR for RAP • Review all RAPs documents prepared by consultants and ensure adequacy under the World Bank Environmental and Social Standards. • Ensures that the beneficiaries comply with social safeguard guidelines given in this RPF • Prepare compliance reports with statutory requirements; • Ensure that PAPs are compensated and carried along in line with this RPF • Review and approve the Contractor’s Implementation Plan for the environment • Liaise with various Central and State Government agencies on environmental, resettlement and other regulatory matters;
World Bank	<ul style="list-style-type: none"> • Assess and monitor implementation process of the RPF/RAP • Review and clearance of ToR for RAP • Responsible for disclosure of RPF/ARAP on the Bank’s external website • Responsible for final review and clearance of RPF/RAP
Local government	<ul style="list-style-type: none"> • Liaising with the SPCU to set up LGA Implementation Units and Ward Facilitation Teams, which shall be responsible for ensuring participation of community and PAPs in resettlement implementation process • The LG will also be responsible for verifying adequacy of resettlement location and provide approval for such sites, providing additional resettlement area if the designated locations are not adequate, provide necessary infrastructures in relocated areas, engage and encourage carrying out comprehensive and practical awareness campaign for the proposed sub-projects, amongst the various relevant grass roots interest groups. • The Local Government Council must be fully briefed and enlightened in the process and steps to be taken in the RPF/ARAP and the overall project execution.
NGOs/CSOs	<ul style="list-style-type: none"> • Assisting in their respective ways to ensure effective response actions, conducting scientific researches alongside government groups to evolve and devise sustainable environmental strategies and livelihood restoration measures. • Organizing, coordinating and ensuring safe use of volunteers in a response action, and actually identifying where these volunteers can best render services effectively

Category	Roles & Responsibilities
	<ul style="list-style-type: none"> Providing wide support assistance helpful in management planning, institutional/governance issues and other livelihood related matter, Project impacts and mitigation measure, Awareness campaigns.
Grievance Redress Committee	Responsible for receiving, registration, verification and processing of grievances and complaints related to the project, including giving feedback to aggrieved persons and the project management.

5.2 Funding Responsibility and Cost

The funding responsibility of SEP activities is within the jurisdiction of the Ministry of Women and Social Development at the federal level through the Federal Project Coordinating Unit (FPCU). At the state level, it is the responsibility of the State government to fund SEP, RAP and ESMP preparation and implementation through the state counter-part fund set aside for the project.

5.3 Cost of Funding SEP Implementation

A deterministic approach was adopted for arriving at indicative cost per state participating in NFWP-SU. This implies that cost estimate arrived at which is N 5,710,000 (\$12,859) is only for one state PCU. Cost items, and breakdown of costs are stated in Table 5.2 below.

Table 5.2: Breakdown of SEP Implementation Budget

Cost Item	Unit	Unit cost	No of Participants	Amount
SEP awareness and sensitivity campaign: <i>Production of jingles, IEC materials such as banners, T-shirts, caps, fliers, newsletters, signages</i>	Lumpsum	500,000	To be determined	500,000

<p>Meetings with MDAs, NGOs, Community, WAGs and vulnerable groups:</p> <p><i>Food, hall, public address system, logistic for vulnerable</i></p> <p><i>(2 meetings in a month for the first 3 months, and quarterly for the next 3 years plan)</i></p>	Lumpsum	<p>N200,000 x 2 meetings per month x 3months =N1,200,000</p> <p>Quarterly meeting (4 times a year) at N200,000 per meeting x 3years = N2,400,000</p>	To be determined	3,600,000
<p>Public address system, Photo Camera, Video camera, Projector</p>	Per unit	<p>Public Address system at N180,000 + Photo camera at N220,000 + Projector at N250,000 + Digital canon video camera at N250,000</p>	-	900,000
<p>Website and server</p>	lumpsum	N350,000		350,000
<p>Vehicle maintenance and fueling</p>	Per purchase time	<p>N30,000 per week x6 (for first 3 months) =N240,000 and N30,000 per quarterly X 3 years estimate =N360,000</p>		360,000
<p>GRM and GBV/SEA operational expenses</p> <p>(Cost included in RAP and ESMP as 10% of implementation budget)</p>	lumpsum			-

TOTAL				N5,710,000
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Central Bank of Nigeria (CBN) exchange rate \$1 = ₦ 444.04 (December 1, 2022)

5.4 Implementation for SEP Activities

A detailed, time-bound implementation schedule will be included in the SEP and other stand-alone instruments which SEP supports including, ESMP, GRM Plan, GBV/SEA Plan and RAP, which will include the specification of the sequence and time frame of the necessary activities under each of them. Table 5.3 presents a highlight of the implementation activity of SEP using the involuntary resettlement activities and SEP responsible party details.

Table 15.3: SEP Activities Responsible Party

NO	ACTIVITY	RESPONSIBLE PARTY
1	Liaising with World Bank/Project Supporters	PCU
2	Coordination of Activities	PCU
3	Preparation and Disclosure of SEP	PCU/World Bank
4	Selection of Sub-Projects	PCU, communities, NGOs/CBOs, World Bank
5	Selection of sub-project sites	PCU/Relevant MDAs/World Bank
6	Vetting of request for compulsory acquisition of land, Oversight of land expropriation and land issuance of titles to resettled PAPs.	Ministry of Lands, Ministry of Physical Planning and Urban Development and Ministry of Environment
7	Social Impact studies (conduct social impact assessment and property impact studies)	PCU through Resettlement Consultant
8	Identify vulnerable people when developing RAPs and ARPs	PCU through Resettlement Consultant
9	1. Marking of affected properties, Inventory of affected properties, Notifications, Request for proof of eligibility, - Consultations	PCU and Local Government Authority
10	Valuation of Affected Properties	Ministry of Physical Planning and Urban Development, PCU
11	Organize and implement census of affected people and census and valuation of affected assets in the framework of the development of ARAP or ARAP	PCU through Resettlement Consultant
12	Consultations, planning and Preparation of RAP	PCU/Consultants
13	Review of RAPs and ARAPs	PCU and World Bank
14	Disclosure of RAP	PCU/World Bank

NO	ACTIVITY	RESPONSIBLE PARTY
15	Internal Monitoring	PCU
16	External Monitoring and Approval	FMEEnv, SMOE, NGOs/CBOs, host Communities, World Bank
17	Preparation of Monitoring and Evaluation Report of RAP and Disclosure	PCU
18	Establishing of Resettlement & Rehabilitation Committees - Utilities Committee to conduct an inventory of properties with utility services - Grievance Committee establish procedures for dispute resolutions - Payment Committee establish payment modalities	PCU, Ministries of Lands and Survey, Physical Planning and Urban Development/Land and Allocation Committees, Ministry of Women Affairs and Poverty Alleviation, Ministry of Agriculture
19	Disclosure of values. Making of offers Processing for payments	PCU/ Resettlement & Rehabilitation Committees /Ministry of Finance
20	Release of funds for payment	Ministry of Finance, PCU
21	Compensation Payments	Payment Committee (PCU/Resettlement Committees, Ministry of Women Affairs and Social Development and Poverty Alleviation
22	Grievance and dispute resolutions	Grievance Committee (PCU/Ministry of Justice, Ministry of Women Affairs
23	Taking possession of site	PCU
24	Representing government for any law court redress cases	PCU, State Attorney General's Office

CHAPTER 6: GRIEVANCE REDRESS MECHANISM

6.1 Introduction

The NFWP already has a fully developed and functional GRM system, guided by an approved GRM manual. The NFWP GRM developed an IT based system (Project Management Information Systems (PMIS)) to manage the entire GRM system. Monthly/quarterly reports in the form of a summary of complaints, types, actions taken, and progress made in terms of resolving pending issues are submitted for review to all focal points at different tier levels. Once all possible avenues of redress have been proposed and if the complainant is still not satisfied then s/he would be advised of their right to escalate to the next level or take legal recourse.

The NFWP-SU, will utilize the existing mechanism established under the NFWP. The project GRM will be operationalized in each participating State to handle all project related disputes arising within the boundaries of the project activities.

Grievance Redress Mechanism (GRM) is an alternative dispute resolution arrangement. Going through the court (judicial system) by aggrieved person for redress may take longer periods and many times, are accompanied with court injunctions which adversely affect project implementation. Therefore, establishing project GRM in each participating State is a proactive measure for addressing and resolving complaints out of court.

Complaints under the NFWP are grouped into seven categories which will apply under the NFWP-SU. These include:

Category 1- Wrongful Inclusion and Exclusion

Category 2- Payments

Category 3- Service delivery

Category 4- Fraud and Corruption issues

Category 5 – Inquires/information requests

Category 6 – other

Category 7 – Gender Based Violence

The NFWP-SU will utilize the procedure established under the NFWP to receive and resolve any queries as well as address complaints and grievances about any irregularities through the GRM. The GRM will also handle complaints and grievances related to resettlement and other social and environmental issues beyond

resettlement in this Project. Similar to the NFWP, Grievance redress committees (GRC) will be formed at each Project level to receive and resolve complaints as well as grievances from aggrieved persons from the local stakeholders including the project-affected persons. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons from having to resort to expensive, time-consuming legal actions. The procedure will, however, not pre-empt a person's right to go to the courts of law.

6.2 Objectives of GRM

The fundamental objectives of the GRM, implemented through the GRC serving as a para-legal body, are to resolve any resettlement-related grievances locally in consultation with the aggrieved party to facilitate smooth implementation of the social and environmental action plans. Another important objective is to democratize the development process at the local level and to establish accountability to the affected people. In other words, the grievance mechanisms:

- a. Provide a way to reduce risk for projects.
- b. Provide an effective avenue for expressing concerns and achieving remedies for communities and promote a mutually constructive relationship.
- c. Prevent and address community concerns and assist larger processes that create positive social change.

6.3 Importance of NFWP GRM

The establishment of a GRM is beneficial for organizational and Project strengthening. Grievances should be seen as a gift and not a threat to the Project. Grievances submitted are a source of valuable information that can help to strengthen the implementation of the Project and provide support and protection to Project beneficiaries. NFWP's ability to resolve grievances demonstrates transparency and accountability to beneficiaries and non-beneficiaries.

Who can raise grievances?

Anyone can raise a grievance about NFWP. Beneficiaries and non-beneficiaries are all welcome to submit complaints on any aspect of NFWP via any of the available grievance channels (e.g. in-person to staff or volunteers or by phone, letter, email, or social media).

Structure for managing grievances and Staff responsible

The following can receive grievances from complainants under the NFWP-SU GRM:

1. Grievance Volunteers and Ward Facilitators* (at community the level)
2. LGA Field Supervisors (LFS) and WAG Support Officers (at LGA level)

3. SPCU GRM Focal Points - specifically the Social Safeguards and Environmental Safeguards Specialists and Advisers (at State the level)
4. FPCU GRM Focal Points – specifically the Social Safeguards and Environmental Safeguards Anchors and Advisers (at Federal the level)

6.4 GRM Procedure

Grievances can be made at the Community, LGA, State, and Federal levels:

1. **Ward Facilitators (WFs):** Members of the communities can channel their complaint to a Ward Facilitator closest to them. The WF will liaise with the LFSs to address complaints.
2. **LFSs / WSOs:** Complaints can be made through the LFSs or WSOs in person or in writing. They are also responsible for reviewing any complaints relating to their LGA received via any channel. They are effectively trained on project activities to collate and address grievances, channeling them as necessary to the SPCU GRM FPs.
3. **SPCU GRM FPs:** Grievances can be made at the state offices either in person, via telephone, in writing, or through any other accessible channel as there are SPCU GRM FPs that have been trained on effectively handling and managing grievances. Telephone numbers for State hotlines will be displayed at various state and local government offices and in Project communities.
4. **FPCU GRM FPs:** At the FPCU level, there are GRM FPs who have been trained on handling and managing grievances and they can receive and register grievances from beneficiaries and non-beneficiaries using any channel convenient for them. Grievances may come in via hotline, in writing, in person, or via social media.

Table 6.1 Categories of Grievances Under NFWP and timeline for response

CATEGORIES	CATEGORIES OF GRIEVANCES UNDER NFWP PROJECTS	RESPONSIBILITIES	RESPONSE TIME FOR FURTHER ACTION
CATEGORY 1	WRONGFUL INCLUSION/EXCLUSION <ul style="list-style-type: none"> • WAG - Wrongful inclusion • WAG - Wrongful exclusion • Livelihood grants – wrongful inclusion • Livelihood grants – wrongful exclusion 	LFS	21 DAYS TO 1 MONTH
CATEGORY 2	PAYMENTS <ul style="list-style-type: none"> • Delay in payment • Incorrect payment amount 	LFS, SPCU FP, SPCU accounting	WITHIN 7 DAYS

CATEGORY 3	SERVICE DELIVERY ISSUES <ul style="list-style-type: none"> • Mistreatment/rudeness by staff • Complaints not responded to • Wrong information / poor communication • Other Service Delivery Issues 	State- or Federal-level GRM FPs, SPCU or FPCU Coordinator	WITHIN 7 DAYS
CATEGORY 4	FRAUD AND CORRUPTION ISSUES <ul style="list-style-type: none"> • Bribe and Extortion • Misappropriation / Theft 	SPCU/FPCU GRM FPs, SPCU Coordinator, NPC	21 DAYS OR MORE
CATEGORY 5	INQUIRIES AND INFORMATION REQUESTS	All GRM FPs	WITHIN 7 DAYS
CATEGORY 6	OTHERS	LFS	7 TO 14 DAYS
CATEGORY 7	GENDER-BASED VIOLENCE <ul style="list-style-type: none"> • Sexual exploitation and abuse (SEA) or sexual harassment (SH) (e.g., staff or contractor inflicting SEA/SH on a beneficiary, community member, or other staff members) • Other forms of GBV (not SEA/SH), e.g., IPV and domestic conflicts (e.g., between project beneficiaries or community members - not involving staff or contractors) 	LFS and SPCU GRM FPs, Gender/GBV Anchors and Advisers are responsible for ensuring GBV-related complaints are treated according to the NFWP GBV Accountability Response Framework The survivor/complainant maintains the right to choose whether further action should be taken on their complaint. They also have the right to change their mind and stop seeking resolution of their complaint.	As soon as the incident becomes known refer using the referral directory If the perpetrator is associated with the project and the survivor wants to proceed with the case the GRM FP should notify the SPCU GRM FP/SPCU Coordinator

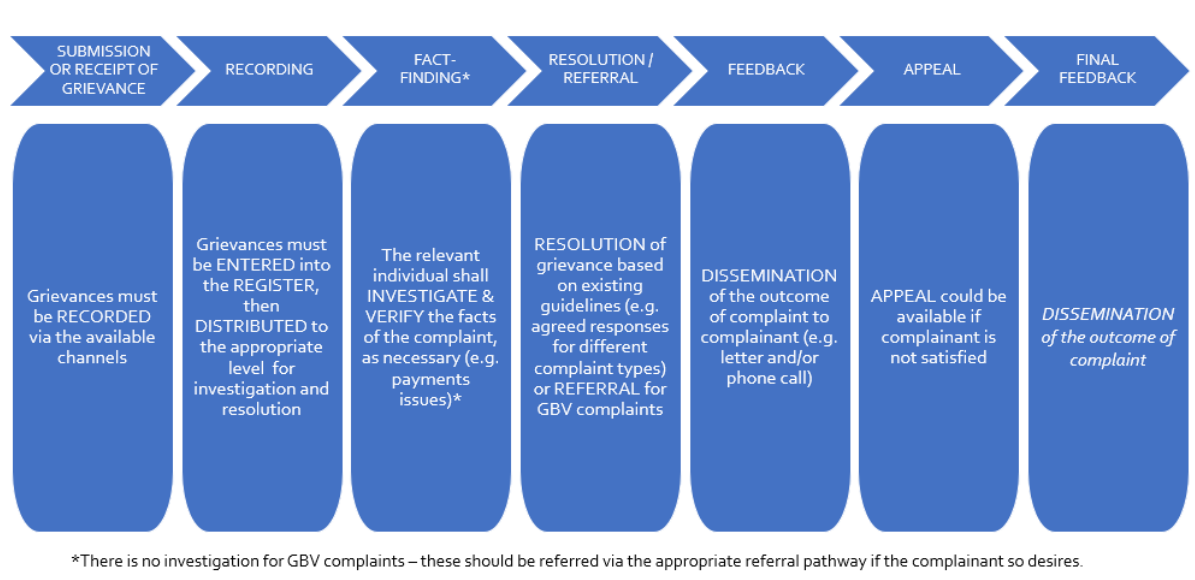
6.5 Addressing complaints related to GBV and SEA/SH

The NFWP GRM takes complaints related to GBV and sexual exploitation or abuse / sexual harassment seriously.

A separate GBV accountability and Response Framework have been prepared to address GBV allegations and to hold perpetrators accountable. However, for any complaint that is reported to the GRM (including complaints involving other forms of GBV that are not related to the project), the GRM will also have procedures in place to refer the individual to GBV service providers.

BASIC PROCESSES IN GRIEVANCE HANDLING

The following are basic processes to be followed in handling grievances:



Service Standards for NFWP GRM

- NFWP will ensure that all grievances are handled and resolved within the specified time frame depending on the category of complaint. The maximum time frame for resolving categories of issues that are within the remit of NFWP will be 3 months (90 days).
- NFWP will ensure that feedback is provided to complainants on the status of their grievances within 28 working days from the time the complaint was first received.
- Where investigations are likely to take more than 7 days, NFWP will provide complainants with a progress update.
- NFWP will guarantee that all complainants are treated with respect and fairness.
- NFWP will ensure that persons with disabilities and other vulnerable groups can easily access the GRM using available channels for registering complaints.
- NFWP will ensure that GBV and SEA/SH complaints are treated appropriately following a survivor-centered approach

Guiding Principles

To effectively manage grievances, there are basic principles that must be followed to ensure that the grievance redress mechanism is effective and valuable to beneficiaries and non-beneficiaries. The key principles include the following:

I.Communicated and Visible

A good grievance mechanism should be clearly communicated to all relevant stakeholders (beneficiaries, the general public, and others). Information on how to channel grievances should be clear and widely publicized. Beneficiaries and non-beneficiaries should be informed on the timelines and the necessary steps that will be taken in handling their grievances. Information on what type of grievances can be made should also be clearly communicated to the beneficiaries, staff, and any other interested party. In the case of NFWP the WFs, WSOs, and LFSs are the frontline staff who engage directly with citizens hence should be well knowledgeable on how the GRM operates

II.Accessible

An effective GRM should be easily accessible by all. It should offer multiple channels for receiving and responding to grievances (e.g. in person, by phone, in writing, etc.). The conditions of the beneficiaries and other interested citizens should be considered when establishing a GRM. For example, if the GRM has a hotline element and there are beneficiaries with no phones, the grievance handling process should offer other alternatives such as face-to-face interaction or writing letters as alternatives for channelling grievances. Also, a good GRM should enable and encourage the use of different local languages in channelling grievances, which makes it more accessible for those who may not understand the official language.

III.Responsive

It is essential that a GRM should be responsive to the needs of its beneficiaries and non-beneficiaries. It should ensure that grievances are acknowledged and issues resolved promptly. Staff handling the complaints must follow the agreed targeted timelines for resolving grievances. A responsive GRM will ensure that complainants are regularly informed on the progress or status of their grievances. A good GRM should be responsive to the needs of different people, including vulnerable persons such as the elderly or disabled, and those who cannot speak or write in English. It should also take a survivor-centered approach to gender-based violence (GBV) and sexual exploitation and abuse / sexual harassment (SEA/SH) complaints.

IV.Fair and Objective

Grievance handling staff should be fair and objective when handling and managing grievances. Grievances should be handled with all sense of fairness and without any bias. Staff receiving grievances should be objective and empathetic towards the complainant and should not be defensive, unfair or seen to be taking sides. Complainants should feel that they were treated fairly and with respect.

6.6 Expectation When Grievances Arise

When local people present a grievance, they generally expect to receive one or more of the following: acknowledgement of their problem, an honest response to questions/issues brought forward, an apology, adequate compensation, modification of the conduct that caused the grievance and some other fair remedies

In voicing their concerns, they also expect to be heard and taken seriously. Therefore, the company, contractors, or government officials must convince people that they can voice grievances and work to resolve them without retaliation. To address these challenges, companies are being called upon to lead and work with their host communities to fund non-judicial, dialogue-based approaches for preventing and addressing community grievances.

6.7 Grievance Redress Process

At the time that the individual resettlement plans are approved and individual compensation contracts are signed, affected individuals and communities will have been informed of the process for expressing dissatisfaction and to seek redress. The grievance procedure will be simple and administered as far as possible at the local levels to facilitate access, flexibility and ensure transparency. All the grievances will be channeled via the Resettlement and Compensation Committee for each sub project at the sub-project level.

There is no ideal model or one-size-fits-all approach to grievance resolution. The best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, local customs and project conditions and scale. Annex 4 contains grievance redress forms that could be used for grievance mechanism. In its simplest form, grievance mechanisms can be broken down into the following primary components:

a. Registration

The first step is the presentation of a grievance at the uptake point at any level. The social contact person or secretary of the committee will receive grievance from the complainant, register and acknowledge receipt of grievance to the grievant within 2 days. The registration form will capture the following data: 1) Case number, 2) Name of the complainant, 3) Date of the grievance, 4) Gender, 5) Complete address, 6) Category of the grievance, 7) persons involved, and impacts on complainant life, 8) Proofs and witnesses, and 9) Previous records of similar grievances.

b. Verification

The verification determines among other things whether the matter has relationship with the project activities, and whether the matter can be handled/resolved at the level where it is presented. This will

determine if the matter should be referred to the next level or not. Part of the investigations may also be to assess the cost of lost or risk involved in the grievance.

c. Processing

The processing step is when options for the approach to resolving the case are weighed and determined. Parties involved in the case are brought together for the first attempt at resolution with suggestions from the parties on practical steps to be taken which may also involve site visit for physical inspection and determination of the claim.

d. Feed back

All responses to the complainant in a grievance redress process that moves beyond a unit level must be communicated in writing and/or by verbal presentation to the complainant. This will include a follow up on the corresponding authority where cases are referred, to ascertain the status of reported cases. Feedback on the outcome of each case should get to the complainant through the secretary of committee or social contact/safeguard person. It is expected that reported complaints at each level will be resolved and determined within **21 days** from the date of receipt of the complaint.

Grievance resolution will be a continuous process in subproject level activities and implementation. The SPCU will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by the Bank and any other interested persons/entities. The SPCU will also prepare periodic reports on the grievance resolution process and publish these on the NFWP-SU website. The NFWP-SU program intends to strengthen the GRM through information and communication technology to ensure that all complaints including those of sexual exploitation and abuse are immediately reported to the Government. NFWP-SU will integrate the GRM on a web-based dashboard, to adequately and promptly address any potential grievance related to Gender Based Violence and SEA. The complaints registered in this system will be managed by a dedicated administrator that will liaise immediately with any GBV and SEA complaints with the contractors, consultant and SPCU for immediate measures. If the GRM receives a case on sexual exploitation and abuse related to the project, it will be recorded, and the complainant will be referred to the relevant assistance, if needed, for referral to any other service providers. The supervision consultant will keep the information confidential to protect privacy of GBV and SEA complainants. In cases, where the perpetrator(s) is linked to project activities then the contractor will take appropriate actions as per the Code of Conduct signed by the particular person and under the effective law in Nigeria. NFWP-SU will report activities and outcomes of GBV and SEA surveillance and management to the World Bank on a regular basis.

6.8 Financing of the Grievance Redress Mechanism and Cost of Remediation

The proponent shall be responsible for the funding of logistics for the GRC as well as the eventual compensation or resettlement remediation that the aggrieved party may be entitled to. It is advised that the SPCU should set aside 10% of its budget for Environmental and Social Safeguards for GRM and GBV/SEA funding. The proponent will also be responsible for the cost of the judicial process for cases that result in court for adjudication. Table 6.1 below shows the implementation plan for the GRM.

Table 6.2: Implementation Plan for Grievance Mechanism

Steps	Process	Description	Completion Time frame	Responsible Agency/Person
1	Receipt of complaint	Document date of receipt, name of complainant, village, nature of complaint, inform the SPCU	1 day	Secretary to GRC at project level
2	Acknowledgement of grievance	By letter, email, phone	1-5 days	Social safeguard officer at SPCU
3	Screen and Establish the Merit of the Grievance	Visit the site; listen to the complainant /community; and assess the merit	7-14 days	GRC including the social safeguard officer & the aggrieved PAP or his/her representative
4	Implement and monitor a redress action	Where complaint is justified, carry out resettlement redress in line with the entitlement matrix/ESS5	21 days or at a time specified in writing to the aggrieved PAP	PC-PCU and Social Safeguard Officer
5	Extra intervention for a dissatisfied scenario	Review the redress steps and conclusions, provide intervention solution	2-3 weeks of receiving status report	PC-PCU
6	Judicial adjudication	Take complaint to court of law	No fixed time	Complainant
7	Funding of grievance process and GBV/SEA (10 percent of ES budget)	GRC logistics and training, redress compensation, court process	No fixed time	The proponent

6.9 World Bank Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by Sub-project interventions may submit complaints to existing project-level GRM or the WB Grievance Redress Service (GRS). Project affected communities and individuals may also submit their complaint to the World Bank's independent Inspection Panel, which determines whether harm occurred, or could occur, because of non-compliance with WB safeguards policies and procedures. Details of the procedures to submit complaints to the WB's

corporate GRS, is available in the GRS website: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the WB Inspection Panel, please visit www.inspectionpanel.org. Any disclosure instrument on GRM will provide addresses of the GRS and the Inspection Panel.

CHAPTER 7: MONITORING AND REPORTING

7.1 Monitoring

It is important to monitor the ongoing stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and that stakeholders have been meaningfully consulted throughout the process. The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project- related activities and to its schedule will be duly reflected in the SEP. The final SEP will have a Monitoring and Evaluation (M&E) action plan which will guide all M&E activities related to the SEP. The two key ways in which the stakeholder engagement process (as will be provided for in the M&E action plan) will be monitored are through the review of Engagement activities in the field and through reporting engagement activities.

7.2 Review of Engagement Activities in the Field

During engagement with stakeholders the E & S team will assess meetings by asking questions to participants, depending on the stakeholder group, to ensure that messages are being conveyed clearly. The E&S team will also conduct debriefing sessions with the engagement team while in the field to assess whether the required outcomes of the stakeholder engagement process are being achieved and provide the opportunity to amend the process where necessary.

Table 7.1: Key Performance Indicators by Project phase

Project Phase	Key activities	Indicator
Preparatory & Planning phase for construction	Preliminary Stakeholder engagement on project designs and anticipated impacts.	Stakeholder engagement reports & records of meetings
	Notification on multi-media (posters, radio, TV Official correspondence	Number of notifications & mode of communication Number of letters/emails sent
Project Implementation	Project Notices issued	Newspaper clippings
	Recorded Grievances in the GRM	All grievances addressed as per grievance procedure

		Pending grievances & suggested resolutions
	SEP Implementation	SEP reports
	Public gatherings	Number of public gatherings & records (topics discussed)
	Official correspondence	Number of letters/emails sent
Project Completion	SEP implementation Project	SEP final report

7.3 Reporting Stakeholder Engagement Activities

Performance will be reviewed following the engagement sessions conducted in the field. In addition, there will be opportunities to review and assess performance in-between the engagement sessions depending on the level of feedback received from stakeholders during these periods.

Evaluation of performance will be assessed based on the extent to which the engagement activities and outputs meet those outlined in this SEP. In assessing performance, indicators will be crafted around the following areas:

- Materials disseminated: types, frequency, and location
- Place and time of formal engagement events and level of participation including specific stakeholder groups (e.g. women, youth, community leaders)
- Number of comments received on specific issues, type of stakeholder and details of feedback provided.
- Numbers and type of stakeholders who come into contact with the Project team by mail, telephone and any other means of communication
- Meeting minutes, attendance registers and photographic evidence
- Comments received by government authorities, community leaders and other parties and passed to the Project
- Numbers and types of feedback and / or grievances and the nature and timing of their resolution, and
- The extent to which feedback and comments have been addressed and have led to corrective actions being implemented.
- Monthly summaries and internal reports on the implementation of the SEP and GRM, together with the status of implementation of associated corrective/preventative actions will be systematized by the PMU Social Safeguards Specialist and reported to the Project Coordinator. The monthly summaries will provide a timely mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner and adjust its operations or approach as necessary.

Table 7.2: Format for Recording Engagement Activities

Date	Location	Stakeholder Group	Form of Engagement	Purpose of Engagement	Key findings	Reference to the Minute of meeting	Remarks
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REFERENCES

1. Template for ESS10: Stakeholder Engagement and Information Disclosure Stakeholder Engagement Plan and Stakeholder Engagement Framework. Available from <http://pubdocs.worldbank.org/en/909361530209278896/ESF-Template-ESS10-SEP-June-2018.pdf> [Accessed on 13 March 2019]
2. Guidance Note for Borrowers: Environment & Social Framework for IPC Operation “ESS10: Stakeholder Engagement and Information Disclosure” Available at <http://pubdocs.worldbank.org/en/476161530217390609/ESF-GN10-June-2018.pdf> [Accessed on 13 March 2019]
3. Federal Government of Nigeria (1999), Constitution of the Federal Government of Nigeria
4. Freedom of Information Act (2011), Federal Government of Nigeria
5. Nigeria for Women Project (2018), Environmental and Social Management Framework
6. Nigeria for Women Project (2018), Resettlement Policy Framework
7. Stakeholder Engagement Plan for ACREASAL (2021), Federal Ministry of Environment

APPENDICES

Appendix 1: Terms of Reference

FEDERAL REPUBLIC OF NIGERIA

NIGERIA FOR WOMEN SCALEUP PROJECT

TERMS OF REFERENCE FOR THE PREPARATION OF STAKEHOLDERS ENGAGEMENT PLAN

BACKGROUND

The World Bank is supporting the Federal Government of Nigeria (FGN) to implement Nigeria for Women Scale-Up Project aimed at addressing inequalities in women's access to jobs and control over productive assets through the platform of Women Affinity Groups (WAGs). The proposed project will build on the FGN's policies and programs that support women's economic empowerment, leveraging partnerships particularly with the private sector and creating an enabling environment for women to overcome institutional failures (including market) and barriers to enhancing productive livelihoods and socioeconomic advancement in personal, technical, financial and entrepreneurial skills.

Currently, the first phase of the project known as Nigeria for Women Project (NFWP) is being piloted in 6 states (Akwa Ibom, Abia, Kebbi, Niger, Ogun and Taraba) and the proposed project will be scaled up in 20 additional states in Nigeria including the current six implementation states.

The proposed Project Development Objective (PDO) is to support improved livelihoods *and access to financial and select public services for women through Women Affinity* in targeted areas of Nigeria. To accomplish the PDO, the project will create and strengthen new and existing Women Affinity Groups (WAGs) with a strong livelihood intervention to enhance household income. Improved access to finance through livelihood grants will enable women to meet specific life cycle needs and mitigate food, education, and health expenses in due course.

PROJECT COMPONENTS

As currently designed, the project has four primary components:

Component 1: Building Social Capital

This component aims to build critical social capital to improve livelihoods and enhance economic productivity of project beneficiaries through supporting the mobilization and establishment of Women Affinity Groups (WAGs) at the grassroots level. To this end, beneficiaries will be mobilized to organize into WAGs, which will operate as self-managed primary institutions, putting in place the necessary institutional platforms at the community level and their aggregation at higher levels. WAGs are intended to support the establishment of producer/livelihood collectives to achieve economies of scale, create larger business networks, facilitate forward and backward linkages along prioritized commodity value chains, and lower and/or reduce women's market entry barriers.

The component will support (i) community mobilization for behavioral change of social norms, including state and local authorities, traditional and religious leaders, and other informal institutions; (ii) formation and strengthening of WAGs, bringing together women with similar socio-economic characteristics interested in improving their engagement in economic activities; (iii) skills formation on group management to practice regular meetings, and up-to-date books of accounts; financial literacy; and advocacy, life and negotiation skills.

Component 2: Livelihoods Programme

This component aims to provide the technical and financial capital necessary to enable members of WAGs to develop and expand productive livelihood activities in traditional and non-traditional sectors. For this, gender-sensitive value chain analyses of priority commodities will be conducted in project States for identifying (i) specific economic sectors in which women are already engaged or could easily engage like in agriculture, animal husbandry, trade and enterprise development, and agro-processing; (ii) potential entry-points for women along the value chain in prioritized sectors; and (iii) the requirement of inputs in terms of skills and capacity, information technology and tools, and capital to improve their participation and productivity. The component will provide support to community institution members under the two following subcomponents:

Subcomponent 2.1: Support to Individual Livelihoods

Based on the gender-value chain and market assessments, the subcomponent will support two key livelihood categories:

- i. For existing livelihoods, the subcomponent will support (a) mobilization and selection of livelihood beneficiaries, formation of Women Affinity Groups wherever appropriate, and strengthening capacities of existing and new livelihood activities for accessing input and output markets; (b) deepening livelihoods and business management skills; (c) improved production through access to input and output markets, technology and equipment, access to storage and processing infrastructure; and (d) facilitation of backward and forward linkages for small producers, processors and retailers within the value chain. Support will be tailored according to the specific opportunities for women's livelihoods in project states.
- ii. For areas with high potential for new livelihood opportunities, the subcomponent will support enhanced skills for increased employability, enterprise development, promotion of other income-generating activities in non-agricultural sectors based on market skills and gaps assessments which will determine the skill-enhancement training, employment, and/or entrepreneurship development that will allow women to take advantage of these opportunities. This subcomponent will build upon successful and innovative approaches to livelihoods, business, entrepreneurship, and life skills formation, including the adoption of applied, hands-on methodologies.

Subcomponent 2.2: Support to Livelihood Collectives

In line with the phased approach of the project, the WAGs that attain the defined level of institutional maturity will have access to grants to meet both the consumption and production needs of members. This subcomponent will build upon the support provided under component 1 on group and money management, ensuring that WAGs and their members are prepared to absorb these funds in the most efficient manner. Activities under this component aim to support existing or new livelihood collectives 1 by supporting the aggregation and creation of scaled-up livelihood enterprises among members of WAGs, including those who have been supported with livelihood grants under Subcomponent 2.1. In doing so, the project will include the provision of grants to support business plans of livelihood collectives, either start-up activities such as training and exposure visits, incorporation, office setup; some initial operational costs; and/or business promotion to support collective livelihoods directly. This includes support in the form of storage facilities, drying yards, higher-volume weighing scales, an automated system for management and standardization of production, packaging, inventory or accounting, and likewise.

Component 3: Innovations and Partnerships

This component will support innovations in social and economic spheres to further women's livelihood outcomes. The identification of these innovations will be through a development marketplace approach which will invite proposals from individuals, CSOs, and private sector to propose interventions that would address particular binding constraints women face in their socio-economic empowerment and in particular access to livelihoods, which can then

be scaled up. While this component, as well as the overall project, is focused on addressing demand-side barriers to economic empowerment, this component will support innovative approaches aimed at addressing supply-side barriers, including those for access to financial services as well as to improve effective project implementation.

Component 4: Project Management, Monitoring and Evaluation and Learning

This component aims to support the socio-economic empowerment of women by supporting the advancement of policy dialogue, strengthening the capacity of implementing partners to provide adequate technical assistance to project beneficiaries, support gender mainstreaming, and ensuring adequate overall project co-ordination and implementation arrangements at the Federal, State and Community levels. Oversight in the areas of financial management, procurement, social and environmental safeguards management, and Monitoring and Evaluation will be supported.

NEED FOR THE CONSULTANCY SERVICES

For the effective project implementation of Nigeria for Women Scaleup Project and its sub-project activities in the participating states, there is a need for open and inclusive engagements/dialogues with stakeholders affected or likely to be affected by the project (project affected parties), 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 and sustainability and empower targeted beneficiaries.

The Stakeholder Engagement Plan will describe the methods of engagement with stakeholders throughout the lifecycle of the project. It will identify 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;
- 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.

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 lifecycle;
- To identify the key stakeholder groups; and
- To identify resources needed and timeframe to achieve effective participation in each stage of the process describe the stakeholder engagement process.

SCOPE OF WORKS

The scope of work for this assignment will include;

1. Description of the project and its potential environmental and social impacts and risks as known at the time of preparation of this strategy;
2. Conduct a Stakeholder identification and analysis process which will include:
 - Stakeholder identification at the federal and state line ministries, departments and agencies; traditional and religious agencies and NGOs in the participating states and Federal level stakeholders. The consultant will identify individuals, groups, communities and other stakeholders that may be directly or indirectly affected by the project (positively or negatively), and other interested parties who may not necessarily be impacted but have a role in project preparation or be in a community affected by the project and have broader concerns other than their individual household. These may include government organization, civil society groups, NGOs etc. Also, there is a need to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the Project because of their marginalized or vulnerable status. *Special attention must be given to identifying disadvantaged and vulnerable individuals or groups.*
 - Carry out an analysis of the identified stakeholders to understand their interests, relevance, motivations and drivers for effective information dissemination and prioritization. The consultant shall analyze them to better understand their relevance and their relative usefulness for this engagement.
 - Consider if the identified stakeholders have information, counsel or expertise on the issue that could be useful to the project and if their knowledge is of value to the project. Are they affected by the project directly or indirectly? How willing is the stakeholder to engage? Are they proactive? How influential is the stakeholder? Who are they likely to influence? Are the identified stakeholders capable of adding value and acting as a multiplier of the impact of the project?
 - Evaluate the stakeholders by the same key criteria and compare them to each other so as to visualize the often-complex interplay of issues and relationships created in the developed criteria. Determine which stakeholders are most useful to engage with and as such decide which stakeholders to be given priority.
3. Development of a Stakeholder Engagement Program which will include:
 - Description of information that will be disclosed, in what formats and language they made be available, and the methods that will be used to communicate this information to stakeholders;
 - Procedure for notifying stakeholders: a variety of methods of communication should be used to reach the majority of stakeholders. These may include the use of radio and TV slots/programs, newspaper publications, information on the Project's website, reports, official correspondence, use of town criers and other local accessible means of communication relevant to the communities. The Consultant should indicate specific names of media channels that will be used for communication;
 - Methods of engagement: Describe the methods that will be used to consult with each of the stakeholder groups (interviews, use of questionnaires, focal group discussions, meetings, etc.). Which measures will be used to remove obstacles to participation? This may include separate mechanisms for consultation and grievances, developing measures that allow access to project benefits, ensure cultural norms are applicable during the consultation process, etc.;
 - Include the length of consultation period: Propose a timeline schedule for the various stakeholder engagements activities. At what stages of the project's lifecycle will the stakeholder engagements take place, with what periodicity, and what decision is being undertaken on which people's

comments and concerns? Provide specific information on how people will be made aware of forthcoming opportunities to review information and provide their views.

- Opportunities to comment: Explain how comments will be gathered (written and oral comments) and reviewed and commit to reporting back to stakeholders on the final decision and a summary of how comments were considered.
 - Provide information dissemination strategy that will enable project acceptance by identified target groups, through both passive (e.g. website, information leaflets, newsletters), and active means (e.g. Townhall meetings, workshops and by direct liaisons with other projects). In addition, develop a communication strategy making use of a campaign-based approach to help target a broader range of stakeholders as well as the general public in order to maximize the impact of the project.
 - Future stakeholder engagements during the implementation of project phases: Explain how people will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism. Projects should report at least annually to stakeholders but often will report more frequently during particularly active periods, when the public may experience more impacts or when phases are changing (for example, quarterly reports during construction, then annual reports during implementation).
 - Indicate how information will be disclosed to stakeholders (promptly) to allow them to understand the opportunities, risks and impacts associated with the implementation of any sub-project. Ensure that disclosed materials are in relevant local language, accessible to all and more specifically taking into account individuals and groups with specific information needs (e.g. disability, literacy, gender and mobility)
4. Indication of resources required, and the responsibilities for implementing stakeholder engagement activities. This should include indicating the resources (human and financial) that should be devoted to managing and implementing the Stakeholder Engagement Plan for the Project.
 5. Description of a summary of the grievance mechanism of the Project: describe the process by which people affected by the project can bring their grievances and concerns to the implementing agencies at the federal and state levels and how they will be considered and addressed. The summary of the process should be provided to the public regularly (however names of individuals must be withheld during disclosure);
 6. Monitoring and Reporting: Describe any plans to involve project stakeholders (including affected communities) in the monitoring of project impacts and mitigation programs that will be identified during the development of safeguard instruments; and
 7. Provide contact information and process for seeking further information.
 8. Capacity building program for Stakeholder Engagement as well as monitoring for the implementing agencies
 9. Development of Monitoring and Implementation plans.

REPORTING

The Consultant will work closely with the Federal Project Coordinating unit within the FPCU

DURATION OF THE ASSIGNMENT AND ESTIMATED STAFF INPUT

The duration for preparing the SEP shall not exceed 4 Weeks. The Consultant shall prepare a detailed work plan for conducting the assignment after contract signing.

DELIVERABLES

The key output of the services is a SEP prepared based on the scope of work under this consultancy. The following report shall be submitted through the Ministry for review and approval and to the World Bank as detailed below:

Inception Report - Not later than one (1) week from contract award, an Inception Report shall be submitted that presents the Consultant's Work Plan, defining the Implementation Schedule by task, and methodology should be submitted. This will include the table of content of the final report. Five (5) hard copies and one electronic copy shall be submitted

Draft Report - Not later than one (2) weeks from the contract award, a draft report shall be submitted. This shall be circulated to the Ministry and the World Bank for review and comments. Issues and comments raised shall be incorporated in the draft final report. Five (5) hard copies and one electronic copy shall be submitted.

Draft Final Report – Not later than three (3) weeks after contract signing, a draft final report that addresses all comments raised at the draft stage shall be submitted. Five (5) hard copies and one electronic copy of this report shall be submitted. This version shall be consulted upon with relevant stakeholders before submission. The final version must contain an executive summary

Final SEP Report– Not later than four (4) weeks from contract signing, a final report which addresses all comments raised shall be submitted in ten (10) hard copies and one electronic copy.

QUALIFICATION AND EXPERIENCE

A master's Degree in Mass Communication or related field with at least 8 years of experience in community engagement, communications, experience with similar assignments, project development and implementation.

Skills, Knowledge and Competencies:

- (a) The ability to write accurate and concise reports;
- (b) Excellent written and oral communication skills in English;
- (c) Familiar with World Bank Operational Policies and Stakeholders Engagement guidelines;
- (d) Ability to understand the changing environment, and to anticipate developments and opportunities, threats, and weaknesses to project a clear pathway forward for the project;

CONDUCT OF THE CONSULTANT

- The Consultant will, at all times, be expected to carry out the assignment with the highest degree of professionalism and integrity. The Consultant will be expected to conduct his/her duties openly and transparently;
- The Consultant will not, under any circumstance, take any actions or be seen to be taking any actions, which may hinder or prevent Nigeria for Women Scaleup Project from executing this assignment;
- The Consultant will study all Nigeria for Women Scaleup Project guidelines and policies and will be expected to ensure that the assignment is concluded with the strictest adherence to all such policies and regulations;
- The Consultant will not, under any circumstances, take any material decision pertinent to this assignment without the express permission and written consent of an authorized representative of Nigeria for Women Scaleup Project; and
- The Consultant will not, under any circumstances, discuss, divulge or use any information regarding this assignment or any other transaction conducted as part of the FGN's Program, without the express written permission of an authorized representative of Nigeria for Women Scaleup Project.

Appendix 2: Summary of Minutes of Public Consultation

Date and time of meeting of meeting	23 rd November 2022 (2pm to 5pm WAT)
Platform/location	Virtual meeting
Attendees	Management staff of Federal Project Coordinating Unit (FPCU), Commissioners, Permanent Secretaries, Special Advisers and Project Coordinators from the relevant MDAs (Ministries of Finance, Women Affairs, Environment, Lands & Survey, Physical Planning & Urban Development and Agriculture) from across the 24 participating states in Nigeria
Introduction	<p>FPCU introduced the aim of the meeting, which was to inform the stakeholders about the imperative of the preparation of Stakeholder Engagement Plan and other instruments of the Environmental and Social Framework (ESF) that need to be satisfied, cleared and disclosed prior to project appraisal. The applicable instruments are:</p> <ul style="list-style-type: none"> • Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts; • Environmental and Social Standard 2: Labor and Working Conditions; • Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention and Management; • Environmental and Social Standard 4: Community Health and Safety; • Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement; • Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure. <p>Stakeholders were informed that 4 ESS instruments were relevant for addressing the applicable standards, at the framework level; and they are the Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Pest Management Plan (PMP) and Stakeholders Engagement Plan (SEP). Therefore, the consultants engaged by FPCU for the assignments want to interact, consult and engage the stakeholders in meaningful and robust conversations with the stakeholders, with a view to informing and gathering concerns and inputs that will be helpful in the preparation of the ESS instruments.</p> <p>Major issues discussed included land acquisition and compensation laws, processes and agricultural crop and economic tree rates applicable in the various states, women land right and ownership, social issues that inhibit women participation in livelihood and community decision making, gender base violence and sexual exploitation and assault, grievance redress mechanism, livelihood value chain in the states and the lessons from NFWP safeguards implementation in the pioneer states.</p>
Responses and lessons	All the stakeholders were appreciative of the Nigerian government and World Bank for the initiative to implement the NFW-SU.

	<p>Concerning land acquisition procedure, it was obvious that the entire participating states align with the provisions of the Nigerian Land Use Act 1978. Most of the states have domesticated the Violence Against Persons (VAP) prohibition Act 2015, which protects the rights of women against abuses and sexual exploitation; Women Right to Land Ownership and Inheritance has been passed into law in Abia state, while the states in the northern Nigeria have no constraints with women ownership of land. Coastal states like Bayelsa, Delta and Lagos are focused on Fish farming livelihood value chain, while those in the north will leverage on crop production and processing, diary, tile and dye amongst others.</p> <p>A key lesson from the NFWP implementation is that some of the cultural limitations to women involvement in livelihood are significantly phasing-out through legislation and sensitization. Example is the Right to Women land Ownership passed into law in Abia state in 2022; VAP law domesticated in many states of Nigeria and the access to use of telephony by women, which many male household heads in the North opposed, have now been eased through sensitization efforts of the NFWP.</p>
Concerns raised	<p>Many speakers including the Permanent secretary from Lagos, Bayelsa, Delta, Zamfara and commissioners from Abia, Nassarawa, Ogun raised concern about access to capital for women;</p> <p>How is the rate of compensation determined?</p> <p>There was also a question on specific time that the project implementation will kick off;</p> <p>Other concerns raised include:</p> <ol style="list-style-type: none"> 1. That project information disclosed for public view should be translated in the local languages for convenience of stakeholders who are not English literate. 2. A stakeholder raised concern about delays in commencement of projects and multiple consultations which are boring and discourages participation. The concern is that project should reduce delays in order not to dash expectations and participation by the host community. 3. A participant wants the SPCUs to use public consultation to inculcate ownership perception in project beneficiary communities, thereby motivating them to support the WAGs in farming and other traditional livelihoods in the area of security in the communities where they will be implement their livelihoods.
How concerns were resolved	<p>NWP-SU will finance mobilization of women into WAGs and support the strengthening of new and existing WAGs, which will create strong platform for eligibility to access to finance;</p> <p>The rate used for compensation for economic crops and trees are as gazetted by the Ministry of Agriculture, and differ slightly by sub-</p>

	<p>regions of Nigeria. During RAP implementation, NfWP-SU will use current market rate price for payment of compensation except if the country rate is more pro-poor.</p> <p>Referring to the other concerns and contributions, the SEP consultant addressed the participants as follows:</p> <ol style="list-style-type: none"> 1. The project information disclosure will ensure that the Executive Summary is translated into the 3 main local languages; 2. He informed the participants to exercise patience in terms of specific time of project implementation, because it can be a function of multiple factors beyond the control of the state. He however, assured them that the FPCU and SPCU will continue to give them regular update about the project, and 3. The consultant welcomed the need for the host communities to own the projects and protect both the investment and beneficiaries.
<p>Conclusion</p>	<p>The meeting stakeholders to assist the consultants for any further information that may be required, and for physical visit for data collection (if required).</p>