



FEDERAL MINISTRY OF FINANCE, BUDGET AND ECONOMIC PLANNING

Stakeholder Engagement Plan

FOR

**Nigeria Human Capital Opportunities for Prosperity and
Equality (HOPE)
(P181476)**

July, 2024

ACRONYMS

AP	Action Plan
BHCPF	Basic Healthcare Provision Fund
CBO	Community Based Organization
DLI	Disbursement Linked Indicator
DP	Development Partner
EA	Environmental Assessment
EBES	Enabling Business Environment Secretariat
E&S	Environment and Social
EIA	Environmental Impact Assessment
ERGP	Economic Recovery and Growth Plan
ES	Environmental Standards
ESCP	Environmental and Social Commitment Plan
ESS	Environmental and Social Standards
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
FCT	Federal Capital Territory
FGD	Focus Group Discussion
FGN	Federal Government of Nigeria
FMoFBNP	Federal Ministry of Finance, Budget and National Planning
FPCU	Federal Project Coordinating Unit
GBV	Gender Based Violence
GDP	Gross Domestic Product
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
HOPE	Human Capital Opportunities for Prosperity and Equality
KPI	Key Performance Indicator
LGA	Local Government Area
MDA	ministries, departments and agencies

NDP	National Development Plan
NEC	National Economic Council
NGF	Nigeria Governors' Forum
NGO	Non-Governmental Organization
NOA	National Orientation Agency
PAPs	Project Affected Persons
PforR	Program-for-Results
RA	Results Area
SEP	Stakeholder Engagement Plan
TA	Technical Assistant
UBEC	Universal Basic Education Commission
UBEIF	Universal Basic Education Intervention Fund
WB	World Bank

SECTION 1

1.0 Introduction

Nigeria, the most populous country and largest economy in Sub-Saharan Africa, boasts a population exceeding 200 million and an estimated GDP of USD 471 billion in 2022, with 94 million people living in poverty. Following a recession induced by COVID-19 and lower oil prices, the economy rebounded, growing by 3.6 percent in 2021 and 3.3 percent in 2022. This growth, surpassing population expansion for the first time since 2015, coincides with critical reforms initiated by the new administration as of late May 2023. These reforms aim to address macroeconomic imbalances, including efforts to eliminate the N4.5 trillion petrol subsidy, representing 2.2 percent of GDP in 2022—almost half the fiscal deficit—and FX market reforms to allow market-reflective pricing in the official exchange rate and eliminate multiple exchange rate windows.

Recognizing the imperative of investing in Human Capital to foster Nigeria’s development, achieve shared economic prosperity, and capitalize on the demographic dividend, the federal Government is developing the Nigeria Human Capital Opportunities for Prosperity and Equality (HOPE) program. This initiative is bolstered by two special purpose funds: the Universal Basic Education Intervention Fund (UBEIF) for basic education and the Basic Healthcare Provision Fund (BHCPF) for primary health care. The program development objective is to support the Federal Republic of Nigeria in strengthening institutions and the allocation and utilization of financial and human resources in basic education and primary health care.

1.1 Project Description

The Investment Project Financing (IPF) component of the HOPE Program for Result (PforR) will be US\$20 million and will include a program of targeted technical assistance to the federal ministries, departments and agencies (MDAs) and states to support achievement of the disbursement links indicators (DLIs). Technical Assistant (TA) to the federal MDAs will support the Office of the Accountant General of the Federation on cash management to ensure timely releases of BHCPF and UBEC funds, building on the capacity building in that area provided under the Fiscal Governance and Institutions Project (FGIP P164360). TA will further be provided to UBEC and the Ministerial Committee that manages the BHCPF funds to support their publication of fund transfer information in effective ways to allow for analysis as well as general citizen monitoring. TA to the NPHCDA on developing minimum standards and service requirements for PHCs will be provided by the companion HOPE-PHC program, as will capacity building on facility assessments and data management systems.

Some of the TA to the states will be delivered through the relevant policy-holding Federal MDAs (e.g., NPHCDA on PHC minimum service standards; UBEC on planning guidelines). Following the successful model of capacity building provided under the SFTAS Program and being replicated under the SABER Program, TA on budgeting and other aspects of public financial management will be delivered through the Nigeria Governors Forum (NGF) secretariat using a combination of just-in-time and customized technical support, training, toolkits and peer to peer learning. NGF, which is not a formal government agency, has proven to be a highly trusted, agile and cost-effective partner in supporting states.

The Program will further build capacity in the Ministry of Budget and Economic Planning on all aspects of program management, including fiduciary, safeguards, monitoring and evaluation and managing the independent verification process.

Through the IPF component, the Program will test the theory of change, support peer learning across states and make adjustments as necessary.

1.3 Stakeholder Engagement Plan and Disclosure

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the Project and any activities related to the Project. The involvement of the local population is essential to the success of the Project to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

The project will ensure a Grievance Redress and Feedback Mechanism is in place for people to report concerns or complaints if they feel unfairly treated or are affected by any of the Project activities.

This SEP is a living document that will be updated during project implementation as more details on the stakeholders' groups and measures are identified.

1.4 Overall Objectives

The overall objectives of SEP as stated in the ESS-10 are:

- To identify the roles and responsibilities of all stakeholders and ensure their participation throughout the project life cycle.
- To establish a systematic approach to stakeholder engagements that will help the HOPE project identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and implementation.
- To promote and provide means for effective and inclusive engagement with project- affected parties throughout the project life-cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format with special consideration for the disadvantaged or vulnerable groups.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow HOPE project respond to and manage such grievances.
- To devise a plan of action that clearly identifies the means and frequency of engagement of each stakeholder.
- To allocate budgetary and other resources in the project design, project implementation, and Monitoring and Evaluation (M&E) for stakeholder engagement and participation.

SEP provides an opportunity for all-inclusive approach in project preparation, planning, implementation and monitoring processes. It is geared towards ensuring meaningful and a wide consultative process guided by World Bank's Environment and Social Framework (ESF), particularly ESS-10.

1.5 Stakeholder Engagement within the context of IPF Component of the HOPE -GOV

The Government of Nigeria, through the IPF Component of the HOPE Gov is committed to ensuring meaningful, effective, and informed participation of stakeholders and partners according to the project cycle which include early planning, problem identification, program design, implementation and monitoring. Effective stakeholder engagement and participation enables, and promotes voice and accountability, project acceptance, local ownership, and beneficiary's empowerment. These will lead to full participation and achieving the project's activities and outputs with support of all stakeholders and reduce disagreement and conflict, support human rights, and enhance social and environmental protection at the same time. The Project will ensure the stakeholder analysis and engagement plan are effectively and sufficiently implemented in the project cycles with close linkage to the citizen engagement and social accountability activities.

1.6 Principles for Effective Stakeholder Engagement

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

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

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

Feedback from stakeholders has been instrumental in designing and revising the Operation's Description (including the Project), indicators, and appraisal documents via providing data and details on the existing situation, management status and priorities of the federal government, the states, and the private sector. A series of consultations organized were held with the Federal Program Coordinating Unit – the Ministry of Health, National Primary Health Care Development Agency (NPHCDA), State Ministries of Health, State Ministries of Finance and Budget, State Health Care Development Boards (SHCDBs), the HOPE Technical Working Group, relevant Federal and State government MDAs, and the private sector, which led to stakeholder contributions to project refining. Other consultations held include the presentation of questions for the pre-Environmental and Social Systems Assessment (ESSA) and consultation on the prepared ESF documents to the operation's stakeholders, during which the SEP and its requirements were also discussed (Table 1).

Table 1: Summary of Stakeholder Consultations dedicated solely to environmental and social aspects

S/No	Consultation	Meeting Dates	Participants	Meeting themes	Feedback	Venue
1	Pre-ESSA Consultations with States (Rivers, Anambra, Enugu, Ogun, Osun & Taraba)	24 th April, 2024	State Commissioners, Permanent Secretaries, Directors and Other Heads of Agencies	<ul style="list-style-type: none"> • Clarity of program design • Discussion on Program ESSA • Policies and plans • Implementation procedure • Track record of system assessment to understand the environmental and social systems of the state • Request for documentation on environmental and social systems at the state level • Project design and implementation priorities • Discussion on the ESF requirements 	Participants provided inputs to the various questions posed on the ESSA questions.	Virtual Meetings/Consultation with the States
2	Consultation on the SEP and other ESF documents (Environmental and Social Commitment Plan – ESCP)	21 st June, 2024	<ul style="list-style-type: none"> - Heads of SPHCB and their equivalents from some States - - Heads of State Ministries of Health - Representatives of Federal Ministry of Health - Organized private sector and - Civil Society Organizations (CSOs) 	Presentation on the overview of the SEP, the ESF, ESCP and grievance redress procedure for the HOPE Project	Participants provided inputs to the various questions posed on the ESSA questions.	Virtual meeting

1.8 Limitations

The stakeholder engagement is an on-going process of the project. It is proposed that this version of the SEP be looked at as the first version. Revisions are to be made in the plan periodically as suggested at an agreed time frame and changes validated during project implementation. This will be in accordance with the reviewing and monitoring process outlined in the subsequent sections. This will allow for the SEP to remain a relevant and useful mode of action.

Aligned with the World Bank's Environment and Social Framework (ESF), specifically Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, implementing agencies are mandated to furnish stakeholders with timely, relevant, understandable, and accessible information. This process necessitates culturally appropriate consultation, devoid of manipulation, interference, coercion, discrimination, or intimidation.

SECTION 2:

2.0 Summary of Regulatory Framework and Standards

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

This section provides an overview of national legal provisions that necessitate citizen engagement, public information disclosure, and adequate responses to public queries, concerns, and grievances related to government actions.

2.1.1 The Freedom of Information Act 2011

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

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

2.1.2 Constitution of the Federal Republic of Nigeria

Chapter two (2) of the Nigerian constitution takes socioeconomic rights of Nigerians into account. This chapter indicates that no citizen should be denied the right to environment, the right to secure an adequate means of livelihood, right to suitable and adequate shelter, the right to suitable and adequate food etc.

Section 20 of the constitution also considers the use of resources and provides that *the* environment must be protected and natural resource like water, air, and land, forest and wildlife be safeguarded for the benefit of all stakeholders.

2.1.3 Environmental Impact Assessment (EIA) Act CAP E12, LFN 2004

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

2.1.4 National Orientation Agency (NOA) Act, 1993

The NOA Act has provisions that encourage Nigerians to take part actively and freely in discussions and decisions affecting their general and collective welfare among other things. The NOA Act facilitates the sensitization of all Nigerians to their rights and privileges, responsibilities and obligations as citizens of Nigeria.

2.1.5 Other Legal Provisions on Stakeholder Engagement and Disclosure

The Nigerian Urban and Regional Planning Act, Cap N138, 2004 requires land development plans to be disclosed to stakeholders, ensuring such projects do not harm the environment or become a nuisance to the community.

2.2 World Bank Environmental and Social Standard on Stakeholder Engagement

The ESF's Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following: "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts;

- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation;
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagements, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not." (World Bank, 2017: 98).
- A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts must be developed by the Borrower. The SEP must be disclosed as early as possible, and before project appraisal, and the Borrower must seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100). For more details on the WB Environmental and Social Standards, please follow the link below: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

SECTION 3

3.0 Stakeholder identification and analysis

3.1 Stakeholder Identification

Project stakeholders refer to individuals or groups who: are affected or likely to be affected by the project (project-affected parties); and may have an interest in the project (other interested parties). Project stakeholders can further be categorized as primary and secondary stakeholders. Primary stakeholders are individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly especially those who are directly affected, including those who are disadvantaged or vulnerable. Secondary stakeholders are broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them.

The Project (IPF Component of the HOPE Operation) stakeholders are defined as individuals, groups or other entities who:

- i. Have a role in the project implementation (also known as ‘implementing agencies’);
- ii. Are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
- iii. May have an interest in the Project (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

3.2 Principles for Stakeholders Engagement

In order to meet best practice approaches, the Nigeria Human Capital Opportunities for Prosperity and Equality (HOPE) project will apply the following principles for stakeholder engagement:

- **Openness and Life-Cycle Approach:** Public consultations for the project(s) will be arranged throughout the entire project life cycle, carried out in an open manner, free from external manipulation, interference, coercion, or intimidation.
- **Informed Participation and Feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format. Opportunities will be provided for stakeholders to communicate feedback, which will be analyzed and addressed.
- **Inclusiveness and Sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive, encouraging all stakeholders to be always involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders’ needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, migrant workers and communities, and culturally diverse ethnic groups.
- **Flexibility:** When social distancing, cultural contexts (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibit traditional forms of face-to-face engagement, the methodology will adapt to other forms of engagement, including various forms of internet- or phone-based communication.

3.3 Stakeholders Categorization

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

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

3.3.1 Implementing Agencies

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

- Federal Project Coordinating Unit (FPCU) Ministry of Budget and Planning
- FMOF
- FMOH
- SPHCB
- State Budget and Planning
- Nigeria Governors' Forum

3.3.2 Affected parties and other interested parties ¹

Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the Nigeria Human Capital Opportunities for Prosperity and Equality (HOPE) project. Specifically, the following individuals and groups fall within this category:

Affected Parties:

1. **Local Residents:**
 - Residents living in the immediate vicinity of project sites.
 - Households affected by project activities (e.g., construction, land use changes).
2. **Women and Vulnerable Groups:**
 - Poor women and female-headed households.
 - Persons with disabilities.
 - Elderly community members.
3. **Health Facility Users:**
 - Patients and their families using the Primary Health Centers (PHCs).
 - Staff and employees working at the health facilities.
4. **Local Farmers:**
 - Farmers whose land might be affected by the project activities.
5. **Local Businesses:**
 - Small and medium-sized businesses operating in the project area.
6. **Youth and Children:**
 - School children and youth groups in the project vicinity.

3.3.3 Other Interested Parties:

The project's stakeholders also include parties other than the directly affected communities, including:

1. Non-Governmental Organizations (NGOs) and Civil Society Groups:
 - Local NGOs focused on health, environment, and social issues.
 - National and international civil society organizations advocating for health and social welfare.
2. Business Owners and Service Providers:
 - Local contractors and suppliers providing goods and services for the project.
 - Private healthcare providers and pharmacies.
3. Educational Institutions:
 - Universities and research institutions conducting health and social studies.
4. Government Officials and Entities:
 - Local government authorities and municipal councils.
 - Representatives from the Federal Ministry of Environment and Ministry of Health.
5. Development Partners:
 - International donors and agencies supporting health and social projects.
 - The World Bank and African Development Bank (AfDB).
6. Community-Based Organizations (CBOs):
 - Local community groups and associations.
7. Media:
 - Local and national media outlets reporting on the project.

3.4 Disadvantaged/vulnerable individuals or groups²

Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following: [add table or list of possible vulnerable groups and the barriers to accessing information, or other Project benefits. Examples include elderly people, persons with disabilities and their caretakers, women-headed households, sexual and gender minorities, the unemployed, and disadvantaged groups that meet the requirements of ESS 7. Identify representative organizations and leaders for these groups who can be partners in stakeholder engagement].

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

SECTION 4

4.0 Stakeholder Engagement Program

The process of engagement and consultation in the project spans the entire lifetime of the project, from inception to its closure. The goal of the project's Stakeholder Engagement Plan is to promote and provide means for effective, inclusive, accessible and meaningful engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them during implementation of the various activities listed under the IPF sub-components of the operation.

While advancing effective, inclusive and meaningful engagement with project- affected parties, the PCU with support from implementing agencies and partners (e.g., Ministry of Health and NPHCDA) shall conduct consultations that will ensure two-way communication processes. The objective of the engagement and consultations plan under the project is to:

- a) Begin early in the project planning process to put together initial views on the project proposal and inform project design;
- b) Encourage stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;
- c) Ensure that stakeholders understand how the project is likely to affect them;
- d) Ensure consistency in messaging;
- e) Continue engagement on an ongoing basis as risks and impacts arise and manage stakeholders' expectations;
- f) Ensure prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;
- g) Consider and responds to feedback;
- h) Support active and inclusive engagement with project-affected parties;
- i) Ensure that consultation(s) is/ are free of external manipulation, interference, coercion, discrimination, and intimidation; and
- j) Ensure consultation (s) is/are documented and disclosed.

4.2. Summary of Project Stakeholder Needs and Methods, Tools, and Techniques for Stakeholder Engagement

Different engagement methods are proposed to address the diverse needs of stakeholders involved in the Nigeria Human Capital Opportunities for Prosperity and Equality (HOPE) project. The methods, tools, and techniques for stakeholder engagement are tailored to ensure effective communication, participation, and feedback from all stakeholders. These methods include:

1. **Structured Agendas:**
 - Description: Meetings and consultations will follow structured agendas to ensure all key topics are covered and discussions remain focused.
 - Stakeholder Needs Addressed: Ensures organized and productive meetings, allowing stakeholders to prepare and participate effectively.
 - **Methods Used:** Formal meetings, community consultations, and focus group discussions.
2. **Focus Group Meetings/Discussions:**

- Description: Small group discussions will be held with specific stakeholder groups to gather detailed feedback and address specific concerns.
 - Stakeholder Needs Addressed: Provides an opportunity for in-depth discussions and input from targeted groups, including vulnerable populations.
 - Methods Used: Focus group meetings, community consultations, and one-on-one interviews.
3. **Community Consultations:**
- Description: Open meetings will be held within communities to provide project updates, gather feedback, and address any concerns.
 - Stakeholder Needs Addressed: Ensures transparency, inclusiveness, and broad-based community participation.
 - Methods Used: Public meetings, village gatherings, and information sessions.
4. **Formal Meetings:**
- Description: Scheduled meetings with government entities, project partners, and key stakeholders to discuss project progress and strategic issues.
 - Stakeholder Needs Addressed: Facilitates formal dialogue, decision-making, and coordination among key stakeholders.
 - Methods Used: Formal meetings, roundtable discussions, and strategic planning sessions.
5. **One-on-One Interviews:**
- Description: Individual interviews with key stakeholders to gather detailed and confidential feedback.
 - Stakeholder Needs Addressed: Allows for personalized engagement and the collection of sensitive or detailed information.
 - Methods Used: Personal interviews, telephone interviews, and face-to-face discussions.
6. **Site Visits:**
- Description: Visits to project sites to observe progress, engage with local stakeholders, and address site-specific issues.
 - Stakeholder Needs Addressed: Provides firsthand insight into project implementation and allows for direct interaction with affected communities.
 - Methods Used: Site inspections, walkthroughs, and on-site consultations.

Examples of Stakeholder Engagement Activities:

- Government Entities: Correspondence by phone/email, formal meetings, and roundtable discussions.
- Local Communities and Vulnerable Groups: Letters to village leaders, traditional notifications, community meetings, focus group discussions, and outreach activities.
- Project Updates and Information Dissemination: Public notices, press releases, project website updates, consultation meetings, information leaflets, and brochures.

Language and Accessibility:

- Information will be disclosed in local languages to ensure accessibility for all stakeholders.
- Documents will be available in culturally appropriate formats and distributed through accessible channels.

4.3. Stakeholder engagement plan

The following table outlines the stakeholder engagement plan for the Nigeria Human Capital Opportunities for Prosperity and Equality (HOPE) project, the plan ensures that all relevant stakeholders, especially vulnerable groups, are consulted and engaged throughout the project stages.

Project Stage	Estimated Date/Time Period	Topic of Consultation/Message	Method Used	Target Stakeholders	Responsibilities
Inception Phase	Month 1	Introduction to the HOPE project and its objectives	Correspondence by phone/email; formal meetings	Government entities, local government authorities	E&S Specialist, Project Manager
Baseline Data Collection	Month 2-3	Current socio-economic conditions and challenges	One-on-one interviews; focus group discussions	Local communities, vulnerable groups (e.g., poor women, persons with disabilities)	Field Assessment Team
Needs Assessment	Month 3-4	Identification of community needs and priorities	Community meetings; letters to village leaders	Community leaders, local NGOs	Community Liaison Officer, Project Manager
Draft SEP Development	Month 5	Proposed stakeholder engagement strategies	Disclosure of project documentation; public hearings	General public, environmental and social NGOs	Project Manager, E&S Specialist
Capacity Building	Month 6-7	Training on engagement methods and communication strategies	Training workshops; outreach activities	Government officials, community representatives	Training Coordinator, E&S Specialist
Feedback & Review	Month 7-8	Review of draft Stakeholder Engagement Plan	Focus group discussions; formal meetings	Government entities, local government authorities, local communities	E&S Specialist
Final SEP Presentation	Month 8	Final SEP presentation and feedback	Formal meetings; community meetings; public hearings	General public, local communities, government officials	Project Manager, E&S Specialist
Implementation	Ongoing	Continuous stakeholder engagement and feedback	Surveys; periodic reviews;	All stakeholders	National Coordinator, E&S Specialist and

Project Stage	Estimated Date/Time Period	Topic of Consultation/Message	Method Used	Target Stakeholders	Responsibilities
			feedback mechanism		Monitoring & Evaluation unit

Activities Focused on Vulnerable Groups

1. Community Meetings and Outreach Activities: Special attention will be given to ensure that poor women, persons with disabilities, and other vulnerable groups are included in the consultations.
2. Disclosure of Project Documentation: Information will be provided in a culturally appropriate and accessible manner, ensuring that vulnerable groups are fully informed about the project.

Methods Used

- Government Entities: Correspondence by phone/email, one-on-one interviews, formal meetings, and roundtable discussions.
- Local Communities/Vulnerable Groups: Letters to village leaders, traditional notifications, disclosure of project documentation in a culturally appropriate and accessible manner, community meetings, focus group discussions, and outreach activities.

Responsibilities

- Project Manager: Overall coordination and management of stakeholder engagement activities.
- Community Liaison Officer: Engaging with local communities and vulnerable groups.
- E&S Specialist/Consultant: Conducting interviews and focus group discussions to collect data, Developing/updating the SEP and ensuring stakeholder feedback is incorporated.
- Training Coordinator: Organizing and conducting training sessions.
- Monitoring & Evaluation Team: Overseeing the monitoring and evaluation of stakeholder engagement activities with support from the E&S team.

4.4 Types of Information to be Disclosed

1. **Stakeholder Engagement Plan (SEP):**
 - Detailed SEP document outlining stakeholder engagement strategies and plans.
2. **Grievance Mechanism (GM) Procedures:**
 - Detailed procedures for lodging complaints and resolving grievances.
3. **Project Orientation:**
 - Information about the project's objectives, scope, and benefits.
4. **Regular Updates on Project Developments:**
 - Progress reports and updates on key milestones.

4.4.1 Formats for Information Disclosure

1. Public Notices:

- Notices will be posted in public places such as community centers, local government offices, and health centers.

2. Press Releases:

- Regular press releases will be issued to keep the public informed about project progress and key developments.

3. Project Website:

- A dedicated project website will host all relevant documents and updates, ensuring easy access for stakeholders.

4. Consultation Meetings:

- Regular consultation meetings will be held with stakeholders to provide updates and gather feedback.

5. Information Leaflets and Brochures:

- Printed materials will be distributed to provide detailed information about the project.

6. Separate Focus Group Meetings:

- Special focus group meetings will be organized with vulnerable groups to ensure their specific concerns and needs are addressed.

4.4.2 Languages for Information Disclosure

- All information will be disclosed in English.
- Additionally, local languages such as Hausa and Fulfulde will be used to ensure accessibility and comprehension by all stakeholders, particularly local communities and vulnerable groups.

4.4.3 Disclosure Strategy

- **Community Meetings:** Detailed project information will be shared during community meetings, allowing for interactive discussions and feedback.
- **Traditional Notifications:** Information will be disseminated through traditional means, such as announcements during community gatherings and religious events.
- **Outreach Activities:** Field teams will conduct outreach activities to distribute information leaflets and brochures and engage directly with community members.
- **Focus Group Discussions:** Separate sessions will be organized for women, persons with disabilities, and other vulnerable groups to ensure their voices are heard and their concerns are integrated into the project plans.
- **Public Hearings:** Formal public hearings will be conducted to provide a platform for stakeholders to express their views and seek clarifications about the project.

This comprehensive information disclosure plan ensures that all stakeholders, including vulnerable groups, are well-informed and actively engaged throughout the project lifecycle.

4.5 Reporting back to Stakeholders.

Stakeholders 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, and on the project’s overall implementation progress.

SECTION 5.

5.0 Resources and Responsibilities for implementing stakeholder engagement activities

5.1 Resources

The National Project Coordinating Unit (NPCU) will be in charge of stakeholder engagement activities for the Nigeria Human Capital Opportunities for Prosperity and Equality (HOPE) project.

The NPCU will put in place a standing budget allocated towards the Stakeholder Engagement Program. This is a budget that, as at, when necessary, will be supplemented and/or increased by other budgets related to the activities required for the SEP. Once the project has been finalised, a detailed budget for the implementation of this SEP will be provided and this will be included in the updated SEP.

The budget for the Stakeholder Engagement Plan (SEP) is [insert amount] and is included in Component [insert component number/name] of the project.

Below is example of the budget table.

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs	Remarks
1. Estimated staff salaries and related expenses					
1a. Communications consultant					
1b. Travel costs for staff					
1c. Estimated salaries for Community Liaison Officers					
2. Events					
2a. Organization of focus groups					
3. Communication campaigns					

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs	Remarks
3a. Posters, flyers					
3b. Social media campaign					
4. Trainings					
4a. Training on social/environmental issues for PIU and contractor staff					
4b. Training on gender-based violence (GBV) for PIU and contractor staff					
5. Beneficiary surveys					
5a. Mid-project perception survey					
5b. End-of-project perception survey					
6. Grievance Mechanism					
6a. Training of GM committees					
6b. Suggestion boxes in villages					
6c. GM communication materials					
7. Other expenses					
7a. [insert]					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET					

Note: Salary costs can be indicative.

This budget ensures that all necessary resources are allocated for effective stakeholder engagement throughout the project lifecycle, including staff salaries, events, communication campaigns, training, surveys, and grievance mechanism activities.

5.2. Management Functions and Responsibilities

The entities responsible for carrying out stakeholder engagement activities are the Ministry of Budget and Planning, Federal Ministry of Health (FMOH), the Federal Ministry of Education (FMOE), State Ministries of Health and Education, Local Government Authorities, and Healthcare Facility Managements. These entities will work collaboratively to ensure effective stakeholder engagement throughout the project lifecycle.

The stakeholder engagement activities will be documented through a comprehensive Stakeholder Engagement Log that will include records of all meetings, consultations, and communications. This log will capture details such as the date, time, location, participants, topics discussed, feedback received, and actions taken. Additionally, periodic progress reports will be prepared, summarizing the engagement activities conducted, key issues raised by stakeholders, and how these issues are being addressed. This documentation will be essential for monitoring and evaluating the effectiveness of the stakeholder engagement process and for ensuring transparency and accountability in the project implementation. Table below provides sample of stakeholders engagement log.

Sample of Stakeholder Engagement Log

Dat	Time	Location	Engagem	Participants/Stake	Topics	Feedback	Actions	Responsi
-----	------	----------	---------	--------------------	--------	----------	---------	----------

e			ent Activity Type	holders Involved	Discuss ed	Received	Taken/N ext Steps	ble Entity
YYY Y- M M- DD	HH AM/P M	[e.g., Commu nity Hall, Office, Online]	[e.g., Meeting, Consultat ion, Focus Group]	[e.g., Local Community, NGOs, Government Officials]	[e.g., Project Overvi ew, Issues Raised, Solutio ns Propos ed]	[e.g., Concerns about project impact, Suggestio ns for improvem ent]	[e.g., Addressi ng specific concerns , Scheduli ng follow- up meeting s]	[e.g., FMOH, FMOE, State Ministry]

SECTION 6

6.1. Grievance Mechanism (GM)

The main objective of a GM is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

6.1. Description of GM

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	The GM structure will be established at National, States, and local levels to ensure accessibility and effectiveness in handling grievances.		PIU
Grievance uptake	Grievances can be submitted via the following channels:		Local grievance focal points, PIU GRM Focal Point
	• Toll-free telephone hotline/Short Message Service (SMS) line		
	• E-mail		
	• Letter to Grievance focal points at local facilities		
	• Complaint form to be lodged via any of the above channels		
	• Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box		
Sorting, processing	Any complaint received is forwarded to the designated grievance focal point, logged in the GM system, and categorized according	Upon receipt of complaint	Local grievance focal points PIU GRM Focal Point

Step	Description of Process	Time Frame	Responsibility
	to complaint types: X/Y/Z		
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by the grievance focal point	Within 2 days of receipt	Local grievance focal points PIU GRM Focal Point
Verification, investigation, action	Investigation of the complaint is led by the Complaint Committee. A proposed resolution is formulated by the committee and communicated to the complainant	Within 10 working days	Complaint Committee composed of PIU members, Community Liaison Officers, and relevant stakeholders PIU GRM Focal Point
Monitoring and evaluation	Data on complaints are collected in the GM system and reported to the PIU every month	Monthly	PIU
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected through follow-up surveys and feedback mechanisms	Post-resolution	Local grievance focal points
Training	Training needs for staff/consultants in the PIU, Contractors, and Supervision Consultants include GM procedures, handling sensitive complaints, and communication skills	Annually	PIU
Reparations	Reparations will be handled by the PIU and may include monetary compensation, service provision, or other appropriate measures. Details will be determined on a case-by-case basis	As needed	PIU

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, they will be advised of their right to legal recourse.

The project will have measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH. These measures include confidential reporting channels, specialized handling procedures, and ensuring the safety and privacy of complainants.

A Labor Grievance Mechanism will also be in place, allowing workers to report grievances related to labor conditions, workplace harassment, and other issues. The Labor GM will be described in detail in the Labor Management Procedures (LMP) which will be prepared accordingly.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects. Ensuring the safety and protection of all stakeholders is paramount.

SECTION 7

7. Monitoring and Reporting

7.1. Summary of SEP Monitoring and Reporting Arrangements

The implementation of the Stakeholder Engagement Plan (SEP) will be monitored and reported through a structured process to ensure transparency, accountability, and continuous improvement. The key aspects of this process are detailed below:

7.1.1 Monitoring Arrangements:

- **Regular Monitoring:** The Project Implementation Unit (PIU) will conduct regular monitoring activities to assess the effectiveness of stakeholder engagement efforts. This includes tracking engagement activities, identifying any issues, and implementing corrective actions as needed.
- **Indicators:** Specific indicators will be used to measure the success of the SEP implementation. These include:
 - Number of community meetings held to discuss project progress.
 - Number of information boards displayed in project-affected areas.
 - Number of focus group discussions conducted with vulnerable groups.
 - Number of grievances received and resolved.
 - Level of stakeholder satisfaction with engagement processes, assessed through surveys and feedback forms.

7.1.2 Reporting Arrangements:

- **Monthly Reports:** The PIU will prepare monthly reports summarizing SEP activities, outcomes, and any issues encountered. These reports will include data on the above indicators and will be shared with relevant stakeholders, including the World Bank.

- Stakeholder Involvement: Stakeholders, including community representatives and local authorities, will be involved in monitoring activities to ensure transparency and inclusiveness. Their feedback will be incorporated into the monitoring reports.
- Annual Review: An annual review of the SEP implementation will be conducted to assess overall performance and make necessary adjustments. This review will include an evaluation of stakeholder feedback and the effectiveness of engagement strategies.
- Dissemination of Information: Monitoring reports and updates on SEP implementation will be disseminated to stakeholders through various channels, including community meetings, the project website, and information boards in project areas. Reports will be available in the local languages to ensure accessibility.

7.2 Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of project implementation. summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. The [quarterly or other] summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways:

Annexes

These can include:

- Records of meetings or consultations (see table 1)
- Visual summaries such as stakeholder mapping or stakeholder diagrams
- Grievance submission form, etc.

Table 1. Template to Capture Consultation Minutes

Complete table below.

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)

Endnotes

¹ For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties:** Persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Other Interested Parties:** Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.
- **Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.
- It is important to note that sometimes projects have different components with very different sets of stakeholders for each component. Those different stakeholders should be considered in preparing the SEP.

² It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project, and to ensure that awareness raising and stakeholder engagement be adapted to take into account such groups' or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full understanding of project activities and benefits. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input into the overall process are commensurate with those of other stakeholders.