FEDERAL REPUBLIC OF NIGERIA

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MINISTRY OF FINANCE

SUSTAINABLE PROCUREMENT, ENVIRONMENTAL AND SOCIAL STANDARDS ENHANCEMENT PROJECT (SPESSE)

Draft Update of Stakeholder Engagement Plan (SEP)
April 2025

ACRONYMS

ACE		Africa Center of Excellence
BPP		Bureau of Public Procurement
CBN		Central Bank of Nigeria
CE		Center of Excellence
CPAR		Country Procurement Assessment Report
CPF		Country Partnership Framework
CPS		Country Partnership Strategy
DLI		Disbursement-linked indicator
DLR		Disbursement-linked results
EA		Environmental Assessment
E&S		Environment and Social
EAD		Environmental Assessment Department
EEP		Eligible expenditure program
EIA		Environmental Impact Assessment Act
ERGP		Economic Recovery and Growth Plan
ES		Environmental Standards
ESF		World Bank Environmental and Social Framework
ESMP		Environmental and Social Management Plan
FGD		Focus Group Discussion
FGIP		Fiscal Governance and Institutions Project
FGN		Federal Government of Nigeria
FMWASD		Federal Ministry of Women Affairs & Social Development
FU		Federal University
GIFMIS		Government Integrated Financial Management System
IA		Implementing Agency
ICT		Information and Communication Technology
IFR		Interim Financial Report
INFU		Independent National Facilitation Unit

IPF			Investment Project Financing
IPPIS			Integrated Payroll and Personnel Information System
ITCILO			International Training Center of the International Labor Organization
ITPV			Independent Certified Third-Party Verifiers
IVA			Independent Verification Agent
KII			Key Informant Interview
LMS			Learning Management System
M&E			Monitoring and Evaluation
MDAs			Ministries, departments, and agencies
MOF			Ministry of Finance (also FMoF)
NERGP			National Economic Recovery and Growth Plan (also ERGP)
nGRen			Nigerian Research and Education Network
NESREA			National Environmental Standards and Regulations Enforcement Agency
NPVCA			Nigerian Procurement Value Chain Analysis
NUC			National Universities Commission
OAuGF			Office of the Auditor General of the Federation

OCDS	Open Contracting Data Standards
PBC	Performance Based Conditions
PEMFAR	Public Expenditure Management and Financial Accountability Review
PES	Procurement, Environment and Social
PFA	Performance and Funding Agreement
PIFANS	Programmatic Integrated Fiduciary Assessment of Nigeria States
PIU	Project implementation unit
PP	Public Procurement
PS	Procurement Standards
PSGRDP	Public Sector Governance Reform and Development Project
SEEFOR	State Employment and Expenditure for Results
SFTAS	States Fiscal Transparency, Accountability and Sustainability
SLOGOR	State and Local Governance Reform
SORT	Systematic Operations Risk Tool

SPESSCE	Sustainable Procurement, Environmental and Social Standards Centers of Excellence
SPESSE	Sustainable Procurement, Environmental and Social Standards Enhancement
SS	Social Standards
TA	Technical Assistance
TOR	Terms of Reference
TWG	Technical Working Group

Contents

1.0 Introduction

The Federal Government of Nigeria (FGN) is implementing the Sustainable Procurement, Environmental and Social Standards Enhancement (SPESSE) Program with initial borrowing from the World Bank in the sum of $80 Million for the parent phase of the capacity building project targeted at sustainably enhancing capacity in managing procurement, environment and social standards in the public and private sectors in Nigeria. Approaching the close of the parent project which comes up in June 2026, the Government of Nigeria (GON) has requested for scale-up of SPESSE program in additional financing of $50 Million, which will sustain the project till June 2029.

The request underscores the significant reach and positive impact of SPESSE, highlighting the importance of ongoing support for capacity building and the continuation of professionalization efforts in procurement, as well as in social and environmental thematic areas. The AF seeks to address the following key issues:

a. Scale-up the capacity development program. Strengthening institutional capacity and enhancing procurement, environment and social standards practitioners' readiness. It will be primarily targeted at the high-spending or critically important Ministries, Departments, and Agencies (MDAs) across Federal and State levels who are responsible for the development activities and public service delivery.
b. Scale-up and sustain the implementation of the procurement, environment and social standards practitioners' professionalization programs.
c. Cover the $4 million shortfall in the parent project which was caused due to SDR-US$ exchange loss and increase of market price of goods and services.
d. Enhance public procurement capacity, efficiency and transparency, and promote sustainable procurement through key initiatives like implementation of Electronic Government Procurement (e-GP) at the Federal level and associated training and change management program.
e. Enhance environmental and social safeguard risk management capacity of Nigeria by modernizing environmental and social safeguard policies, practices and systems.

The AF will build on the successes and lessons learned from the ongoing project. It will continue to rely on successful delivery of Track A-E courses by the six Centers of Excellence (CEs) in the three thematic areas: procurement, social and environment. However, the AF will now focus on targeted public organizations, such as the high spending and critical Ministries, Departments, or Agencies (MDAs) at the Federal and State level, as primary beneficiaries of the various courses offered by the CEs. This approach aims to better align the SPESSE AF's PBC financing with the professionalization efforts of the public sector workforce at both the Federal and State levels. The AF will also scale-up and support the certification process and its institutionalization ensuring full sustainability and operational efficiency of the certification bodies. The following six PBCs out of the 18 original PBCs will be scaled-up under the AF:

- PBC# 2 (Track A-Short Courses: Graduates No.)
- PBC# 6 (Track B-Advanced Courses: Graduates No.)

- PBC# 8 (Track C-Post Graduate Diploma: Graduates No.)
- PBC# 10 (Track D –Masters: Graduates No.)
- PBC# 14 (Track E - Bachelors: Graduates No.)
- PBC# 17 (BPP, FMEnv and FMWA: No. of PES certificates issued)

The AF will support roll-out of electronic government procurement (E-GP) and associated capacity development and strategic change management communications program at the federal level through a new PBC. This initiative is a crucial component of an effective and integrated public financial management system. E-GP system enhances transparency in procurement processes, reduce administrative burdens, accelerate procurement timelines, and reduce costs associated with procurement management for both the public and private sectors. It also provides broader access to procurement opportunities, benefiting a wider range of suppliers, including small and medium-sized enterprises (SMEs) and businesses owned by women or underrepresented groups. The current procurement professionalization efforts will be aligned with the digitization of procurement processes. Previous initiative in implementing the E-GP system in Nigeria at the federal level supported by the Fiscal Governance and Institutions Project (FGIP) failed due to contractual dispute between the e-GP service provider and the BPP. The new initiative is built on the lessons learnt and similar experiences by other African countries which faced similar challenges like Uganda, Tanzania, Rwanda, Ethiopia and Malawi. The new system will be owned by the BPP and will be easily customizable to the country's procurement context, covering end-to-end procurement and contract management cycle with provision to connect with the other PFM systems. A business model will also be adopted so that the system can earn revenue to continue its operations and maintenance costs at the end of the project closure. The system will also have provision to customize it for the state level procurement to roll it out at the interested States in the future. The AF will include one PBC related to the adoption of E-GP by the targeted MDAs at the federal level.

The AF will also support development of environment and social safeguard systems and practices through the TA**.** AF will support activities like development of electronic repository and tracking system for the environmental and social assessments and their implementation in Nigeria and strengthen FMEnv and FMWA and other relevant MDAs capacity to enhance environment and social safeguard practices.

The AF will maintain the PDO of the parent project without any change. The AF will continue the same two components of the parent project. However, the title of the Component 1 has been modified as "Institutional Capacity Enhancement in Procurement, Environment and Social Standards and Project Management" from "Technical Assistance and Support to Implementing Agencies" to better align with its scope.

The implementation arrangements will also remain unchanged. Only minor change under the AF is that the Six CEs will rely on the PBC earnings for the achievement of scalable results, they will not have access to the TA under the AF. The NFIU at NUC and IAs will continue to have access to TA to support the project coordination activities including recruitment of the Independent Third-Party Verification Agent (ITPVA), as well as support the sustainability of the certification schemes, update the PES course

curricula, develop procurement, environment and social systems, implement strategic change management and communication program, and policy support to enhance PES practices in Nigeria.

Social risk classification in this project is "**low**" because construction of infrastructure or buildings are not envisaged. The project will not finance activities that involve land acquisition, restrictions on land use, or involuntary resettlement. The allocation of funding to SPESSCEs is based on the funding needs of each Center of Excellence (CE). Each center's funds is distributed across a set of disbursement-linked indicators/results (DLIs/DLRs). Given that the project seeks to build capacity within the public and private sectors, it is critical to engage these various stakeholders. In this regard, the multisectoral agencies involved in the project would engage their internal and external stakeholders, to ensure that there is adequate buy-in for the project and all stakeholders are able to participate by contributing meaningfully to the process and are able to raise questions, concerns and request clarifications whenever necessary throughout the project life-cycle. This is very important particularly for the vulnerable groups because it would give them opportunities to contribute and play a key role in the process.

The SEP is a participatory tool designed to provide guidance on how the various agencies involved in the SPESSE program would identify, map/categorize, engage and maintain a responsive and transparent communication line with project stakeholders. Overtime, stakeholder engagements has been carried out by the key project implementing agencies and this SEP update highlights the implementation progress by the various implementing agencies, with focus on leveraging the experience gained to foster a sustainable stakeholder management. The SEP update is also necessitated by the need to mainstream additional stakeholders and the type of engagement expected to have with them.

This SEP is a living document and will be updated throughout the project lifecycle. It will be:

- Disclosed prior to project commencement;
- Be the strategic tool for all project related engagements;
- Periodically updated and changes validated during project implementation; and
- Monitored and its effectiveness evaluated towards the end of the project

Although this initial SEP has been developed with significant input from the Bank, overall stakeholder engagement will be carried out by the key implementing agencies and subsequent activities would be captured to update the draft at a strategic level, by each implementing agency.

1.1 Project Background

One of the key impediments to achieving efficiency and effectiveness of public investments is the lack of adequate Procurement, Environmental and Social (PES) systems capacity in the country, which are major factors in improving governance and delivery. This is in addition to the lack of reliance on digital technologies and capitalizing on the digital economy. Procurement, environmental and social standards is strategic to achieving the government goals because of the rising poverty level which has been linked to poor procurement related practices which is prone to corruption and wastage. Losses relating to poor procurement practice is significant to the nation because approximately 60 percent of

the Nigerian budget expenditure passes through the procurement process. The government has been implementing some reforms in the procurement process with its development partners but there still remains the challenge of these reforms trickling down to the state government and local government level. There is also the lack of adequate procurement capacity due to the absence of capacity development strategy and a shortage in the number of qualified procurement professionals. This necessitates an urgent need to strengthen procurement institutions and systems to improve transparency and accountability in procurement.

With respect to the environmental and social aspects, the nation has weak technical and operational capacities for environmental and social due diligence in all sectors in addition to the scarcity of personnel with the requisite environmental and social skills.

This project is in response to the significant gaps identified in the procurement, environmental and social sectors in the governance of the Nigerian economy. To ensure states adopt reforms, including incentives for state participation the project is designed with layered mechanisms including:

1. Establishment of Centers of Excellence (CEs): The CEs established in each of the geo-political zones of the country are to deliver capacity-building programs in procurement, environmental, and social standards. These centers serve as hubs for training and knowledge dissemination, fostering a culture of best practices that states can adopt including a gender-sensitive approach to capacity building, ensuring women and marginalized groups are included.

2. Stakeholder Engagement: SPESSE emphasizes inclusive stakeholder engagement, involving national and sub-national governments, development partners, NGOs, and the private sector. This collaborative approach ensures that states are actively involved in the reform process, fostering ownership and commitment to the project's objectives

3. Disbursement-Linked Indicators (DLIs): SPESSE utilizes DLIs to incentivize performance. Funding to participating entities, including states, is tied to the achievement of specific, measurable results. This approach encourages states to implement reforms effectively to access financial support.

1.2 Project Description

The project is the first attempt to develop and implement a curriculum for procurement and E&S standards in Nigeria by offering professionalization and academic tracks in a custom-made, fit-for-purpose and sustainable manner through Centres of Excellence established in Nigerian Federal Universities similar to the Africa Center of Excellence (ACE) programs. While ACEs focus on regional collaboration within Sub-Saharan Africa, this project will focus on collaboration with Nigerian public, private, academic and sector partners.

The cornerstone of this project is the creation of Centers of Excellence (SPESSCE) in Nigerian Universities to deliver capacity building in a sustainable manner in procurement, environmental and social standards. To accompany such an initiative, key stakeholders will be effectively engaged in design, implementation and monitoring. This capacity development project is strategically and operationally planned in an aligned and coordinated manner across all tiers of government and involving all stakeholders (national and sub-national government, development partners, NGO's, private sector, etc.). Additionally, it is tightly linked to real-time performance and change management

program. This creates continued urgency for using the newly developed capacities, and it creates a feedback loop from learning to performance which in turn helps inform curriculum design/enhancement and instruction delivery mechanisms. The adopted methodology will ensure a holistic approach to the elevation of capacities in Nigeria in full reliance on technology and E-learning tools and facilities.

1.3   Project Components

This multi-disciplinary AF project is composed of two main components
   A.   Component I: Institutional Capacity Enhancement in Procurement, Environment and Social Standards and Project Management
   B.   Component II: Establishment and Operating of the SPESSE Centers of Excellence

Project Sub-Components:

A. Component I: Institutional Capacity Enhancement in Procurement, Environment and Social Standards and Project Management

Sub-Component 1(a) - TA to Federal Bureau of Public Procurement. The TA will facilitate several key activities to strengthen the capacity of BPP in its regulatory function and improve the overall public procurement capacity of the country. The activities will include update procurement training curriculum, train the trainers, capacity development program for bidding community, MSMEs, public officials and other stakeholders, policy support to update the procurement policy framework, update standard procurement documents, prepare procurement manuals, development of e-GP system, develop e-GP Guidelines, roll-out plan and business model, support to procurement certification scheme, strategic communication and outreach program. The TA will also provide support to the Public Procurement Committees of the Senate and House of Representatives through the BPP to strengthen their capacity for effective regulation of procurement practices in Nigeria.

Sub-Component 1(b) - TA to Federal Ministry of Environment. The AF will support improvement in environment and social risk management practices. AF will support activities like implementation of the new ESHIA Bill, harmonization of ES certifications schemes in the country and support it and development of electronic ESHIA reports and data repository and tracking system. The AF will strengthen FMEnv and other relevant MDAs' capacity to manage environment and social risk practices in Nigeria.

Sub-Component 1(c) – TA to Federal Ministry of Women Affairs. FMWA together with the Department of Lands in the Federal Ministry of Works and Housing (FMW&H), the Federal Ministry of Labor & Employment will support the certification scheme for Social node including establishing Nigeria Social Standard Professional Certification Program (NSSPCP) body to manage and sustain the certification scheme. Areas of support will also include developing/updating the curriculum on compensation methodology, GBV, other social risk management practices, develop facilitator manual in the Minimum Professional Competency Benchmarks (MPCB), develop Social Standards Practitioners Body of Knowledge Book (BoK), data repository for social standards documents/reports.

Sub-Component 1(d) - TA to National University Commission. TA will support NUC in its project coordination and monitoring activities, including recruitment of ITPVA, update and streamline the PES course curriculum, train-the-trainers initiative, strategic change management and communication program, coordination with the target MDAs across Federal and State level to nominate trainees for the PES courses, policy support to enhance PES practices in Nigeria, as well as support the sustainability of the PES capacity development programs. The TA allocation also includes US$ 4 million to cover the shortage of fund under the parent project.

Sub-Component 1(e) – PBC to BPP, FMEnv and FMWA. This sub-component will scale-up the issuance of PES certificates from the parent project's target of 4,000 to 14,000. The PBC proceeds will be used to continue the operation of the PES certification schemes including maintaining the certification portals, communication and outreach programs, activities to sustain and institutionalize the PES certification schemes.

Sub-Component 1(f) – PBC to BPP for implementation of e-GP. The AF will include one PBC related to the adoption of e-GP by the MDAs at the federal level. BPP will be responsible for this PBC. There are about 850 Federal MDAs. High spending and most critical MDAs will be prioritized for the early roll-out. The roll-out plan will be included in the updated Project Implementation Manual (PIM). The AF will support roll-out of electronic government procurement (E-GP) and associated capacity development and strategic change management communications program at the federal level through a PBC. This initiative is a crucial component of an effective and integrated public financial management system. E-GP system enhances transparency in procurement processes, reduces administrative burdens, accelerates procurement timelines, and reduces costs associated with procurement management for both the public and private sectors. It also provides broader access to procurement opportunities, benefiting a wider range of economic operators, including small and medium-sized enterprises (SMEs) and businesses owned by women or underrepresented groups. The current procurement professionalization efforts will be aligned with the digitization of procurement processes. The previous initiative in implementing the e-GP system in Nigeria at the federal level supported by the Fiscal Governance and Institutions Project (FGIP) failed due to contractual disputes between the e-GP service provider and the BPP. The new initiative is built on the lessons learnt and experiences by other African countries like Uganda, Tanzania, Rwanda, Ethiopia and Malawi which faced similar challenges. The new system will be owned by the BPP and will be easily customizable to the country's procurement context, covering end-to-end procurement and contract management cycles with provision to connect with the other PFM systems. A business model will also be adopted so that the system can earn revenue to generate its operations and maintenance costs starting the end of the project funding. The system will have provision to customize it for state level procurement in the future by interested states.

B. Component 2: Establishment and Operating of the SPESSE Centers of Excellence

1.   This component includes 5 scaled-up PBCs to deliver the Track A-E PES programs/courses by the CEs. The parent project also had the same PBCs. However, the AF will scale-up the end target for those PBCs as mentioned below. The parent project only covered the first two years of the 4 years Bachelor's degree programs. The parent project's duration could not accommodate the full four-year bachelor's degree program, and the first batch of student is currently at the 2 year of their study. The

AF will incentivize the number of bachelor's degree graduates when the parent project only incentivized the number of bachelor's degree students who finished year 2 of the 4-year program.

Parent Project PBC No.	PBC	Parent Project Target	Additional Target under the AF	Total targets under the Parent Project and AF
2	Track A-Short Courses: Graduates No	12,000	12,000	24,000
6	Track B-Advanced Courses: Graduates No.	5,000	5,000	10,000
8	Track C-Post Graduate Diploma: Graduates No.	1,900	900	2,800
10	Track D –Masters: Graduates No	1,140	900	2,040
14	Track E - Bachelors: Graduates No.	350		350

2.   The AF will now mainly focus on the targeted public organizations, such as the high spending and critical MDAs at the Federal and State levels, as primary beneficiaries of the various courses offered by the CEs. This approach aims to better align the SPESSE AF's PBC financing with the professionalization efforts of the public sector workforce at both the Federal and State levels. A demand assessment is being finalized to identify the target MDAs. The details of the MDAs and breakdown of the number of trainees from each of the selected MDAs will be provided in the Project Implementation Manual (PIM).

1.4 Overall objectives

The overall objectives of the SEP as stated in the ESS-10 are to:
- To identify stakeholder and their roles and responsibilities, and ensure their participation in the complete project cycle
- Establish a systematic approach to stakeholder engagements that will help SPESSE identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties
- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and implementation
- 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.
- 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.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the SPESSE Project Grievance Redress Committee (GRC) to 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
- Structure how feedback loops will work, ensuring that stakeholder concerns translate into project adjustments.

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

1.5   Rationale for SEP Update

The SEP prepared previously under the parent project was carried out at a time that the risk level was moderate, and certain stakeholders were not identified. Also, the project implementation followed DLIs, which were 17 in number, but has now been reduced to 6 and uses performance-based conditions (PBC). The original Project design targeted support for Technical Assistance (TA) in the CEs, which are no longer the case, except for the training of staff of MDAs of the relevant Federal and State agencies in Procurement, Environmental and Social Standards. Specifically, the SEP update is necessitated by the following:

- To provide stakeholders with information on changes in the project implementation targets and procedures under the AF;
- To highlight new stakeholders, including students, Nigerian Upstream Petroleum Regulatory Commission, and Nigerian Midstream and Downstream Regulatory Authority that have newly joined the list of stakeholders
- To disclose that the project has been adjudged "Low Risk" from moderate risk categorization, which by the law of the World Bank mandates the use of Country System, and
- To identify and explore the application of the Nigerian Country System, its applicability to the project, gaps and adaptability measures.
- To structure a framework that fosters mutual trust, respect and transparent communication between SPESSE and its stakeholders, thereby, avoiding and resolving project related conflicts and grievances.

1.6 Stakeholder Engagement Plan and Disclosure

This Stakeholder Engagement Plan (SEP) will BE disclosed publicly. This plan addresses specific risks identified by stakeholders, including the exclusion of certain beneficiaries in target areas, risks to vulnerable peoples etc. and will be updated as and when necessary.

The objective is to establish a systematic approach for stakeholder engagement, maintain a constructive relationship with them, consider stakeholders' views, promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. The project will set up a project-specific Grievance Redress and Feedback Mechanism for people to report concerns or complaints if they feel unfairly treated or are affected by any of the sub-projects.

1.7 Stakeholder Engagement within the context of AF-SPESSE

The underlying principle of stakeholder engagement for the project will be that engagement shall be: a) free of manipulation, b) free of interference, coercion, and intimidation, and conducted based on timely, relevant, understandable and accessible information, in a culturally appropriate format. It shall involve interactions between project's stakeholders and shall provide stakeholders with an opportunity to raise their concerns and opinions and shall ensure that this information is taken into consideration when designing the project and making decisions.

The project's stakeholder's engagement aims at creating a "social licence"[1] and will depend on mutual trust, respect and transparent communication between SPESSE and its stakeholders. It will thereby improve decision-making and environment and social performance. This could lead to managing costs and risks, enhancing reputation, avoiding conflict, improving corporate policy, identifying, monitoring and reporting on impacts, and managing stakeholder expectations.

1.8 Principles for effective stakeholder engagement

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

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

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1.9 Structure of Stakeholder Engagement Plan

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

1.0   Introduction
2.0   Context of Country Systems for Stakeholder Management
3.0   Stakeholder Identification and analysis
4.0   Stakeholder Engagement Program

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[1] Social license refers to the ongoing acceptance of a company or industry's standard business practices and operating procedures by its employees, stakeholders and the public

5.0   Grievance Redress Mechanism

6.0   Monitoring and Reporting

2.0 Context of Country Systems for Stakeholder Management

2.1 Introduction

Nigeria's stakeholder management systems are designed to engage and coordinate various actors, including government agencies, private sector players, civil society organizations, and local communities, particularly in projects related to procurement, environmental, and social standards. These systems are embedded in national policies, legal frameworks, and institutional mechanisms. This section therefore, presents a brief overview of the national legal provisions that necessitates citizenship engagement, disclosure of public information and adequate response to queries, concerns and grievances raised by the public on key government actions

2.1.2 Constitution of the Federal Republic   (1999)

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

2.1.3 The Freedom of Information Act (2001)

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 organizations providing public services, performing public functions or utilizing public funds. According to the Act,

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

2.1.4 Public Procurement Act (2007)

Regulates public procurement processes and mandates transparency and stakeholder engagement in government contracts. The Bureau of Public Procurement (BPP)- ensures stakeholder participation in procurement planning, evaluation, and contract award processes.

2.1.5 Environmental and Social Impact Assessment (ESIA) Act (1992, Updated 2022)

The Act requires public consultation and stakeholder engagement before approving major projects. - Managed by the Federal Ministry of Environment and enforced through the National Environmental Standards and Regulations Enforcement Agency (NESREA). - Stakeholders include affected communities, NGOs, private sector, and local government authorities.

2.1.6 Land Use Act (1978, Revised 1999)

The land use act guides land acquisition and resettlement processes, ensuring fair compensation and consultation with affected stakeholders.

2.2. Digital and Public Participation Platforms

2.2.1. Open Contracting Data Standards (OCDS) Porta

Provides access to procurement data, allowing stakeholders to track government contracts.

2.2.2. National e-Government Platforms

This is used by Ministries and Agencies to engage citizens through public consultations, social media, and feedback mechanisms.

2.3 Institutional Mechanisms for Stakeholder Engagement

2.3.1. Bureau of Public Procurement (BPP)

Oversees stakeholder consultation in procurement processes. - Works with contractors, civil society, and the private sector to ensure compliance with procurement laws.

2.3.2. Federal Ministry of Environment (FMEnv)

Leads Environmental and Social Impact Assessments (ESIA) to involve local communities, environmental groups, and businesses. - Enforces sustainability and safeguards policies in line with global standards.

2.3.3. National Environmental Standards and Regulations Enforcement Agency (NESREA)

Monitors compliance with environmental laws, ensuring industries and businesses engage with relevant stakeholders.

2.3.4. State and Local Government Authorities

Facilitate grassroots engagement, especially in land acquisition, resettlement, and community-driven projects. - Work with traditional rulers, community-based organizations, and local businesses.

2.3.5. Civil Society Organizations (CSOs) & Non-Governmental Organizations (NGOs)

The CSOs and NGOs act as watchdogs, ensuring government and businesses follow stakeholder engagement policies. - Provide advocacy, research, and capacity building for communities and marginalized groups.

2.4   Challenges in Nigeria's Stakeholder Management System

The Nigerian Country-Stakeholder Management System exists, but are fraught with weak enforcement of engagement policies in procurement and environmental governance, limited public awareness of grievance mechanisms, political interference in stakeholder consultations and capacity gaps in government institutions to engage stakeholders effectively. While, the ESF rules of the World Bank has changed, allowing for low risks projects to use Environmental and Social systems of the country, the application of the use of country system under this project will require measures to filling the observed gaps. These measures are those from the ESS 10 of the World Bank that have been potent in stakeholder management under the parent project.

2.5 World Bank Environmental and Social Standard on Stakeholder Engagement

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

- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts;

- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation;

- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders

consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).

A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100). For more details on the WB Environmental and Social Standards, please follow the link below: https://www.worldbank.org/en/projects-operations/environmental-and-socialframework/brief/environmental-and-social-standards

3.0 Project Stakeholder identification and Analysis

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

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

(i) Have a role in the project implementation (also known as 'implementing agencies');

(ii) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and any other parties that have an interest in the Project ('interested parties'). They include students, faculty members, administrators, or university support staff.

(iii) individuals, institutions or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

3.1 Stakeholder Categorization and Classification

For the purposes of effective and tailored engagement, the stakeholders of SPESSE can be further classified into four definitive categories/classifications:

1. High Influence / High Interest parties
2. High Influence / Low Interest parties
3. Low Influence / High Interest parties
4. Medium Influence / Medium parties

Table 3.1 presents a matrix of stakeholder influence-interest classification. The matrix helps to inform the reader about the roles of the various stakeholders in the project and the classification type, while the level of their classification is stated in Table 3.2.

Table 3.1 presents a matrix of stakeholder influence-interest classification

Stakeholder	Influence	Interest	Role	Classification
National Universities Commission (NUC)	High	High	Regulator	Influencer & Interested
Joint Admissions and Matriculation Board (JAMB)	Medium	Medium	Policy Contributor	Influencer
University Faculties	Medium	High	Implementer	Interested Party
University Management of the SPESSE	High	High	Implementer	Influencer & Interested

Stakeholder	Influence	Interest	Role	Classification
World Bank	High	Medium	Financier/Partner	Influencer
Federal Ministry of Finance	High	Medium	Funding & Oversight	Influencer
Federal Ministry of Environment	Medium	Medium	Regulator	Influencer
State Ministries of Environment	Low	Medium	State Oversight	Interested Party
Federal Ministry of Women Affairs	Medium	High	Social Inclusion	Influencer & Interested
Bureau of Public Procurement (BPP)	High	Low	Regulatory (Proc.)	Influencer
Petroleum Upstream Regulatory Commission (PURC)	Medium	Low	Sector regulator	Influencer
SPESSE Vendors/Contractors	Medium	High	Service Providers	Interested Party
Students	Low	High	Beneficiaries	Interested Party
Civil Society Organizations (CSOs) & NGOs	Medium	High	Advocacy/Monitoring	Interested Party

Table 3.2   Engagement Method of the Stakeholders based on their Influence-Interest Level Classification

Level of Classification	Description	Stakeholders	Engagement Strategy
High Influence, High Interest	Stakeholders who have the power to influence the project significantly and are highly interested in its success.	• NUC; • University Management; • Federal Ministry of Women Affairs	Manage Closely: Engage actively through regular consultations, updates, and involvement in decision-making processes.

Level of Classification	Description	Stakeholders	Engagement Strategy
High Influence, Low Interest	Stakeholders with significant power but limited interest in day-to-day activities.	• World Bank • Federal Ministry of Finance • Bureau of Public Procurement • Federal Ministry of Environment	Keep Satisfied: Keep them informed at a strategic level. Engage occasionally to ensure their support is maintained.
Low Influence, High Interest	Stakeholders who are affected by the project or have strong interest but limited power to influence it.	• Students • Vendors/Contractors • Civil Society Organizations • University Faculties • State Ministries of Environment	Keep Informed: Share information regularly. Provide opportunities for feedback and consultation.
Medium Influence, Medium Interest	Stakeholders with minimal power and limited interest in the project.	• JAMB • Petroleum Upstream Regulatory Commission	Monitor (Minimal Effort): Observe their position and engagement level, but do not over-communicate.

3.1.2 Affected Parties

This comprises of persons, groups and other entities studying at one of the implementing Nigerian Universities who will be recipients/beneficiaries of the capacity building program. This group is the core target audience and will be directly affected by the project implementation or/and outcomes. A subset of this category are the vulnerable groups. A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the program. Vulnerable Groups are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status[2,] and that may require special engagement efforts to ensure their equal representation in the consultation and participation in the program.

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

The vulnerable groups identified by the project include women, students living in security threatened states, and persons with disabilities[3] (such as the blind, the crippled and economically marginalized students [4]. Online platform seems to be the preferred platform for delivering the PES trainings, and the citizens participation in the training programs under this platform maybe affected frequent vandalization of communication infrastructure in some northern states. This is most likely to exclude many from virtual participation in the courses. Women are considered vulnerable as the curriculum and training programs may exclude their participation. Furthermore, there could be heightened risks of GBV and sexual harassment at the project workplace and academic programs.   Although, the number of vulnerable people may not be established within this framework development stage, it is expected that the respective Centers of Excellence will determine this by conducting a screening and site specific social assessment. It is also not inconceivable to state that SPESSE institutions should design and implement vulnerability mitigation measures including but not limited to installation of handrails, ramps, provision of wheel chairs, engagement of sign-language curriculum and tutors in PES, and promotion of GBV avoidance measures.

Engagement with the vulnerable groups and individuals often requires the application of bespoke measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and participation in the process are commensurate to those of the other stakeholders.

3.1.3 Interested Parties

Interested Parties include stakeholders who may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could influence the project and the process of its implementation in some way. Specifically, this category will include the following individuals and groups:

- The local population who can benefit indirectly from the capacity building program;
- Residents and business entities, and individual entrepreneurs in the area of the project that can benefit from the capacity training program;
- Local contractors who can support in the delivery of the SPESSE program;
- Environmental and Social Consulting organizations in Nigeria that have staff that can be trained and will help build a cadre of trained professionals
- Environmental protection authorities;

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[3] Persons with disabilities the demand and supply side barriers to inclusive education so as not to exacerbate inequality and limit the ability of persons with disability from attending, completing and accessing quality learning
[4] women to face multiple barriers based on gender and its intersections with other factors, such as age, ethnicity, poverty, and disability, in the equal enjoyment of the right to quality education. This includes barriers, at all levels, to access quality education and within education systems, institutions, and classroom

- Local, regional and national level civil societies and non-governmental organizations (NGOs) with an interest in PES safeguards;
- Other government ministries and regulatory agencies at regional and national levels including environmental, technical, social development and labor authorities;
- SPESSE employees and contractors; and
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations. The media will be engaged through press releases, interviews, or dedicated media briefings,

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

3.1.1 Implementing Agencies

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

- **Federal Ministry of Finance (FMoF)** – Oversees financial management system of the program to ensure accountability, liaises with the World Bank for loan agreement and ensures timely disbursement of funds to the SPESSE implementing agencies and Centers of Excellence
- **Federal Ministry of Women Affairs and Social Development (FMWSD)** – They collaborate with the CEs and Technical Working Groups to integrate gender sensitive content (gender equity, prevention of GBV, support for women and vulnerable group empowerment) into training curriculum for professionals in procurement, environmental, and social standards.
- **Technical Working Group (TWG)** on Social Development (Ministry of Women and Social Development, Ministry of Labour and Productivity, and Ministry of Power, Works and Housing): Their roles include curriculum development, policy advice and quality assurance.
- **The EA Department of the Federal Ministry of Environment**: provides regulatory oversights, reviews environmental and social safeguard documents prepared for SPESSE, issues environmental compliance certificate and responsible for approving public disclosure of SEP and other safeguard instruments
- **Bureau of Public Procurement (BPP)** – Responsible for setting the procurement curriculum framework used in SPESSE training institutions, collaborate with the CEs to design certification programs for procurement officers and public servants, develops and enforces minimum professional standards for procurement training and certifying institutions.

- **Nigerian University Commission (NUC)** – It serves as the national coordinator for SPESSE, collaborates with the World Bank and participating MDAs to supervise the design, implementation and sustainability of the program across the 6 implementing universities in Nigeria.

- **Nigerian Upstream Petroleum Regulatory Commission (NUPRC):** They play an advisory and sector-specific technical support role by helping to align training certification, and policy frameworks with Nigeria's petroleum regulatory environment.

- **Nigerian Midstream and Downstream Regulatory Authority (NMDPRA):** provides technical guidance to SPESSE institutions on environmental and safety standards applicable to midstream and downstream operations, including emission control standards, pollution prevention protocols and health, safety and environmental (HSE) best practices. Its potential role may also include the design of compliance training modules for professionals in areas like tank farms, pipelines, and fuel distribution.

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

- *Openness and life-cycle approach*: Public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the project(s) is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups identified by the project which include the rural population, people living with disabilities, women, and disadvantaged youth.

4.0 Stakeholder Engagement Plan

The overarching goal of the Stakeholder Engagement Plan (SEP) for SPESSE in Nigeria is to engender inclusive, transparent and meaningful participation of all stakeholders throughout the project lifecycle, ensuring that the program is socially responsive, environmentally responsible and sustainably implemented in line with World Bank ESS 10 and national guidelines. This section

presents SEP engagement methods and tools, summary of stakeholder consultations, disclosure strategies, timetable for disclosure and cost.

4.1 Summary of Stakeholder Consultations to Date

During the appraisal stage, the ministries and institutions were consulted to inform them about the project, World Bank ESF and general safeguard concerns that need to be mainstreamed into the project. Their support to the project was also solicited along with a discussion on needs and capacities. Subsequently, a stakeholder workshop was held at National Universities Commission, Abuja on the 27th August 2019, where stakeholders were convened to discuss and make further inputs on the instruments of the project like the Stakeholders Engagement Plan, the Environmental and Social Commitment Plan (ESCP) and the ESMF. A lot of engagements have taken place with several stakeholders between 2019 and the present period. Table 4.1 highlights the summary of consultations that have taken place during the implementation phase, while the previously held consultations, during the appraisal stage is attached as annex 1.

The following are the summary of consultations undertaking with relevant stakeholders during the implementation period:

Table 4.1 Highlights of Consultations:

S/N	Stakeholder Consulted	Type of Engagement	Date	Key Outcomes
1.	University Management of the 6 SPESSE Universities (VC, DVCs, Bursar, Registrar)	Sensitization meeting on SPESSE Project/ SPESSE Project Launch	28 October 2021 (After achieving Project Effectiveness)	1. Created awareness of the Project and its objectives; 2. Encouraged the buy-in of the universities' management.
2.	Universities' Faculty selected to train the students of the 5 SPESSE Tracks	Training of Trainers Workshops	Several training sessions across the 3 thematic areas (procurement, environmental standards and social standards)	Built the capacity of the lecturers tasked with training the students of PES.
3.	Directorate of Academic Planning, NUC	Meetings to discuss resource verification exercise for the SPESSE programmes	2022	Planned and executed the resource verification of the PES for undergraduate and postgraduate education.
4.	Directorate of Accreditation, NUC	Meetings to discuss special accreditation for the SPESSE programmes	2023 (After MTR)	Planned and executed the accreditation of the PES programmes for undergraduate and postgraduate education.
5.	Permanent Secretaries and Director General of hosting MDAs; Coordinators of SPESSE at IAs; VCs of hosting universities; Centres' Leadership and Project staff; World Bank	1. National Project Review Committee Meetings; 2. Implementation Support Missions	1. Bi-annually since 2021 2. Annually	Discussions and agreements on activities towards achieving project objectives.
6.	Joint Admissions and Matriculation Board	Meetings to discuss the inclusion of PES undergraduate programmes on the JAMB application portal	2023	Planned and executed the inclusion of undergraduate programmes of PES on the JAMB portal.
7.	Office of the Head of Civil Service of the Federation	Meetings to discuss the creation of cadres for PES in the Civil Service	2023 – 2024 (ongoing)	Planning the creation of civil service cadres for graduates of procurement, environmental standards and social standards

4.2 Engagement Methods and Tools

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

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

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

Information that is communicated in advance of public consultations primarily includes an announcement thereof in the public media – local, regional and national, as well as the distribution of invitations and full details of the forthcoming meeting well in advance, including the agenda. It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the stakeholders. These parameters can be achieved through the following approaches:

- **Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication**. That is, it should be made available via publicly accessible locations and channels. The primary means of notification may include mass media and the dissemination of posters/ advertisements in public places. The project keeps proof of the publication (e.g. a copy of the newspaper announcement) for accountability and reporting purposes. Existing notice boards in the implementing agencies and the universities may be particularly useful for distributing the announcements. When the notifications are placed on public boards in open air, it should be remembered that the posters are exposed to weather, may be removed by by-passers or covered by other advertisements. The project's staff will therefore maintain regular checks in order to ensure that the notifications provided on the public boards remain in place and legible.
- **Another critical aspect of the meeting preparation process is selecting the methods of communication that reach the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the project**. Oral communication is an option that enables the information to be readily conveyed to such persons. This includes involving

the selected stakeholder representatives and institutional leaders to relay up-to-date information on the project and consultation meetings to the various target audiences. Advertising the project and the associated meetings via radio or television and making direct calls (in case fixed-line or mobile phone communication is available) is another method that allows reaching out to the remote audiences. The announcement of a public meeting or a hearing is made sufficiently in advance, thereby enabling participants to make necessary arrangements, and provides all relevant details, including date, time, location/venue and contact persons.

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

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

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

- Participant's name and affiliation (these items are not mandatory if the participant prefers to keep the form confidential)
- How did they learn about the Project and the consultation meeting?
- Are they generally in favour of the Project?
- What are their main concerns or expectations associated with the Project or the particular activity discussed at the meeting?
- Do they think the Project is of benefit to them and the stakeholder group they represent?

○ Is there anything in the Project design and implementation that they would like to change or improve?

○ Do they think that the consultation meeting has been useful in understanding the specific activities of the Project, as well as associated benefits and outcomes? What aspects of the meeting do they particularly appreciated or would recommend for improvement?

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

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

4.3 Description of Engagement Methods

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

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

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

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

If a large audience is expected to attend a public meeting or a hearing, necessary arrangements will be made to ensure audibility and visibility of the presentations. This includes provision of a microphone, proper illumination, projector, places allocated for the wheelchair users, etc.

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

- Taking written minutes of the meeting by a specially assigned person or a secretary;
- audio recording (e.g. by means of voice recorders); and
- Photographing.

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

Table 4.2 shows some tools for engagement for information disclosure and feedback.

Table 4.2: Methods/Tools for Information Provision, Feedback, Consultation and Participation

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Information Provision				
Distribution of printed public materials: leaflets, brochures, fact sheets	Used to convey information on the Project and regular updates on its progress to local, regional and national stakeholders.	Printed materials present illustrative and written information on the SPESSE program. Presented contents are concise, clear and easy to understand by a layperson reader. Graphics and pictorials are widely used to describe technical aspects and aid understanding.	Distribution as part of consultation meetings, awareness campaigns, discussions and meetings with stakeholders.	◻ Government Ministries, Departments and Agencies ◻ All project affected parties ◻ Project interested parties ◻ Other potential stakeholders

Distribution of printed public materials: newsletters/ updates	A newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of Project achievements, announcements of planned activities, changes, and overall progress.	Circulation of the newsletter or update sheet with a specified frequency in the Project Area of Influence, as well as to any other stakeholders that expressed their interest in receiving these periodicals. Means of distribution – post, emailing, electronic subscription, delivery in person. The mailed material can be accompanied by an enclosed postage-paid comment/feedback form that a reader can fill in a return to the Project's specified address.	☐ All projected affected parties ☐ All project interested parties ☐ Implementing Universities ☐ Government Ministries, Departments and Agencies

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Printed advertisements in the media	Inserts, announcements, press releases, short articles or feature stories in the printed media – newspapers and magazines	Notification of forthcoming public events or commencement of specific Project activities. General description of the Project and its benefits to the stakeholders.	Placement of paid information in local, regional and national printed media, including those intended for general reader and specialised audience	☐ All projected affected parties ☐ All project interested parties ☐ Other potential stakeholders

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Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV.	Description of the Project, Project development update and processes. Advance announcement of the forthcoming public events or commencement of specific Project activities.	Collaboration with media producers that operate in the region and can reach local audiences.	⬜ Government Ministries, Departments and Agencies ⬜ Implementing universities ⬜ All projected affected parties All project interested parties Other potential stakeholders
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project activities, processes and timeline. Updates on Project development.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	⬜ Participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. ⬜ Government Ministries, Departments and Agencies
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, post offices, shop, local administrations.	⬜ All projected affected parties ⬜ All project interested parties ⬜ Other potential stakeholders

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Information Feedback				
Information repositories accompanied by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various Project-related materials and documentations.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience are also given free access to a register of comments and suggestions.	⬜ All projected affected parties ⬜
Dedicated telephone line (hotline)	Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations and environmental protection.	Any issues that are of interest or concern to the direct project beneficiaries and other stakeholders.	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.	Any project stakeholder and ⬜ interested parties.

| Internet/Digital Media | Launch of Project website to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public. | Information about Project operator and shareholders, Project development updates, employment and procurement, environmental and social aspects. | A link to the Project web-site should be specified on the printed materials distributed to stakeholders. Other on-line based platforms can also be used, such as webconferencing, webinar presentations, web-based | ⬜ Project stakeholders and other interested parties that have access to the internet resources. |

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
	Web-site should have a built-in feature that allows viewers to leave comments or ask questions about the Project. Website should be available in English		meetings, Internet surveys/polls etc. Limitation: Not all parties/stakeholders have access to the internet, especially in the remote areas and in communities.	
Surveys, Interviews and Questionnaires	The use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.	Description of the proposed Project and related processes. Questions targeting stakeholder perception of the Project, associated impacts and benefits, concerns and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups. Administering questionnaires as part of the household visits.	All project affected parties.
Feedback & Suggestion Box	A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project. Contents of the suggestion box should be checked by designated Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the stakeholders. Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with local stakeholders.	Project affected parties, especially vulnerable groups.

Consultation & Participation				
Public hearings	Project representatives, the affected public, authorities,	Detailed information on the activity and/or facility in question,	Wide and prior announcement of the public hearing and the	⬜ Project affected parities

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

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Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
				☐ Implementing Universities ☐ Relevant Government Ministries and Agencies
Project Implementation Units (PIUs)	Project's designated venue for depositing Project-related information that also offers open hours to the stakeholders and other members of the public, with Project staff available to respond to queries or provide clarifications.	Project-related materials. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the info centre or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.	☐ All project affected parties ☐ Project interests' parties ☐ Other potential stakeholders

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4.4 Description of Disclosure Methods

As a standard practice, this SEP in English will be released for public review for the period of 30 days in accordance with Nigerian regulatory frameworks. Distribution of the disclosure materials will be done by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access. Free printed copies of the SEP in English will be made accessible for the general public at the following locations:

- Federal Ministry of Finance;
- Federal Ministry of Women Affairs and Social Development;
- Environmental Assessment Department of the Federal Ministry of Environment;
- The Ministries under the Technical Working Group;
- National Universities Commission;
- Bureau of Public Procurement;
- State Ministries of Environment;
- SPESSECE at the Implementing Universities;
- Nigerian Upstream Petroleum Regulatory Commission
- Nigerian Midstream and Downstream Regulatory Authority
- Other designated public locations to ensure wide dissemination of the materials.

Electronic copies of the SEP 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 planned development and to initiate their involvement in the public consultation process. The web-site will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

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

4.4.1 Timetable for Disclosure

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

- Placement of the SEP in public domain – 21-working days effective upon when the SEP report is cleared by the World Bank.
- Public consultation meetings with project stakeholders to discuss feedbacks and perceptions about the program – Dates to be confirmed by SPESSE Implementing Agencies

- Addressing stakeholder feedback received on the entire disclosure package – Dates to be confirmed by SPESSE Implementing Agencies.

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

The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table 4.3 below provides a description of stakeholder engagement and disclosure methods recommended to be implemented during stakeholder engagement process.

Table 4.3: Stakeholder Engagement and Disclosure Methods

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

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

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5.0 Grievance Management

In compliance with the use of country system, grievance management under this AF shall be site specific to the various CEs. Given that all the CEs and ACEs have their internal GRM, the SPESSE project will align with the structures and procedures of the grievance systems in the place. However, the E&S officers will have to review and submit to the Center and World Bank, the summary of the existing GRM system consistence with with ES 10 of the World Bank. Where it is found weak the project will adapt to changes that will strengthen the system. The ES10 of the Bank shall be a guiding reference to the review.

A workable GRM system is one in which the process would be specially designed to collect, collate, review and redress stakeholders' concerns, complaints and grievances. This process will be carried out using dedicated communication materials (specifically, a GRM brochure or pamphlet) which will be developed to help stakeholders become familiar with the grievance redress channels and procedures. Locked suggestion/complaint boxes will be posted in each implementing agency and university and they will maintain a grievance register in order to capture and track grievances from submission to resolution and communication with complainants. Project website (and that of the implementing agencies) will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder. It will also provide information on the way grievances will be handled, both in terms of process and deadlines.

5.1 Grievance Redress Mechanism (GRM)

Project-affected-people and any other stakeholders may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). The overall objectives of the GRM are to:
*   Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to specifics in program components.

*   Strengthen accountability to beneficiaries, including project affected people.

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

5.2 Grievance Resolution Framework

Information about the GRM will be publicized as part of the initial program consultations and disclosure in all the participating agencies. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project implementation unit offices, notice boards available to strategic stakeholders, etc. Information about the GRM will also be posted online at the universities' and other implementing agencies' websites.

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

- *Step 1: Uptake.* Project stakeholders will be able to provide feedback and report complaints through several channels such as filling up grievance forms, reporting grievances to implementing agencies, submitting grievance via email address made available by the implementing units and via the implementing institutions' websites collection boxes stipulated for the grievance uptake.

- *Step 2: Sorting and processing.* Each unit / department of the implementing institutions will conduct a prompt sorting and processing of all grievances. The processing will involve the internal escalation process to specific desks to review, resolve and respond to grievances raised.

- *Step 3: Acknowledgement and follow-up.* Within seven (7) days of the date a complaint is submitted, the responsible person within the unit will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. The information provided to complainant would also include, if required, the likely procedure if complaints had to be escalated outside the unit and the estimated timeline for each stage.

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

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

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

options, which would include pursuing remedies through the World Bank, as described below, or through a court of competent jurisdiction.

5.3 SPESSE Grievance Escalation Process

GRM Stage One - Specific Implementing Department Level Resolve

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

5.3.1   Timeframe for addressing grievances before escalation

Below is a matrix that specifies maximum period a grievance should be addressed before escalation. The stipulated timeframes are applicable across the various stages of grievance uptakes.

Stage	Action	Recommended Timeframe	Responsible Entity
Stage 1: Acknowledgement of Grievance	Confirm receipt of complaint (in writing or verbally)	Within 2 working days	SEP Officer or GRM focal person at Center of Excellence
Stage 2: Preliminary Assessment & Categorization	Classify as simple, sensitive, or complex; refer if needed	Within 3 working days	Project GRM Team or Institutional Safeguards Officer
Stage 3: Resolution at First Level (Informal)	Dialogue or mediation with complainant	Within 10 working days	Local GRM Committee or Safeguards Unit
Stage 4: Resolution at Second Level (Formal)	If unresolved, escalate to SPESSE National Coordination Unit	Within 15 working days from escalation	National GRM Officer, NUC, or relevant ministry

Stage	Action	Recommended Timeframe	Responsible Entity
Stage 5: Independent Review / Arbitration	For complex or contested grievances (e.g., GBV, resettlement)	Within 30 working days	Independent Panel, Ombudsman, or Legal/CSO mediator
Stage 6: Closure and Feedback	Notify complainant, document resolution, close the case	Within 5 working days after resolution	SEP/GRM Secretariat

GRM Stage Two – Implementing Agency Level Resolve

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

GRM Stage Three – SPESSE Ombudsman Level Resolve

The SPESSE Ombudsman shall be formed of key officers from all the implementing agencies. The ombudsman shall be responsible for resolving all grievances escalated to it. The ombudsman shall meet quarterly to review the grievance registers maintained by each implementing agency and use the same to update the grievance dashboard which shall be the compendium of all grievances raised across implementing agencies.

5.4 Grievance logs

Each implementing agency shall establish a grievance uptake point.
- Individual reference number

- Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously)

- Details of the complaint, feedback, or question/her location and details of his / her complaint.

- Date of the complaint.

- Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.)

- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution.

- Date when proposed resolution was communicated to the complainant (unless anonymous).

- Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution.

- Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out

- If necessary, details of escalation procedure

- Date when the resolution is implemented (if any).

5.5 Disclosure or Communication of Grievance Resolution

Concerned Stakeholders such as the aggrieved parties, PIU and World Bank shall be furnished with regular updates about grievances reported and the status of the resolutions. This shall be done through any or a combination of the following channels: letters, emails, phone calls meetings and monthly and regularly grievance log reporting,

5.6 Monitoring and reporting on grievances

Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the . To ensure management oversight of grievance handling, the NUC will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

5.7 Points of contact

Information on the project and future stakeholder engagement programs will be available on the project's website and will be posted on information boards in the respective project implementation Units. The point of contact regarding the stakeholder engagement program are: Federal Ministry of Environment

Description	Contact details
Name and position	Mr. Shittu Huaasain Project Coordinator
Address:	Environmental Assessment Department, Federal Ministry of Environment, Abuja

E-mail:	Shusaain310@yahoo.co.uk
Telephone:	07086300269

Federal Ministry of Women Affairs and Social Development

Description	
Name and position	Mr. Benjamin Okwesa, Project Coodinator
Address:	Federal Ministry of Women Affairs, Abuja
E-mail:	okwesabenjamin@yahoo.com
Telephone:	08038979148

Federal Ministry of Finance

Description	Contact details
Name and position	Mr. Stephen Ohaeri, Project Coordinator
Address:	International Economic Relations Department, Federal Ministry of Finance, Abuja
E-mail:	sylverstyv@yahoo.com
Telephone:	08068343121

Bureau of Public Procurement

Description	Contact details
Name and position	Mr. Adebowale Adedokun, Project Coordinator
Address:	Bureau of Public Procurement, Abuja
E-mail:	adebowale.adedokun@bpp.gov.ng
Telephone:	08055171713

Nigeria Universities Commission

Description	Contact details
Name and position	Dr Joshua Atah
Address:	National Universities Commission, Abuja

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E-mail:	jaatah@nuc.edu.ng
Telephone:	08033145148

5.8 World Bank Grievance Redress System

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

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

- By email: grievances@worldbank.org

- By fax: +1.202.614.7313

- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA

- Through the World Bank Nigeria Country Office in Abuja: 102 Yakubu Gowon Crescent, Asokoro , Abuja

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

In addition, project-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or could occur, as a result of the World Bank's non-compliance with its policies and procedures. Complaints may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank's attention, and after Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank Inspection Panel may be found at www.inspectionpanel.org.

6.0 Monitoring and Reporting

The Stakeholder Engagement Plan will be periodically revised and updated as necessary in the course of capacity building program implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified stakeholders and methods of engagement remain appropriate and effective in relation to the project context and specific stages of the implementation. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.

6.1 Reporting

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project(s). The monthly summaries will provide a 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.

Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
  - Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
  - Frequency of public engagement activities;
  - Geographical coverage of public engagement activities – number of locations and Universities covered by the consultation process;
  - Number and details of vulnerable individuals involved in consultation meetings;
  - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
  - Type of public grievances received;
  - Number of press materials published/broadcasted in the local, regional, and national media;

6.2 Criteria for Revising the SEP

Revisions should be initiated when any of the following occur:

a. Project Scope Change

• New infrastructure construction or expansion

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• Institutional partnerships added or dropped

b. Stakeholder Mapping Shift

• New communities affected (e.g., land use changes)

• Emergence of newly identified vulnerable groups (e.g., displaced students)

c. Low Engagement Indicators

• Poor attendance at consultations

• Marginalized groups not participating or benefiting

d. Recurrent or Escalating Grievances

• Complaints indicating poor communication or exclusion

• Feedback loops broken or inadequate

e. Legal/Policy Changes

• New national laws or updated World Bank policies that affect transparency, data use, or inclusion practices

f. Monitoring Data Suggests Gaps

• M&E results show outdated data, ineffective outreach, or declining satisfaction

6.3   Mechanisms for Stakeholders to Suggest Updates

Below is a matrix that details the mechanism for stakeholders to suggest updates including the frequency of review and methods or channels for making suggestions.

Channel	Description	Frequency of Review
Community Suggestion Boxes	Anonymous submissions at project sites/universities	Reviewed bi-weekly by SEP officer

Channel	Description	Frequency of Review
Online SEP Feedback Form	Digital feedback form hosted on SPESSE's website	Real-time access; compiled monthly
Stakeholder Forums/Focus Groups	Quarterly or biannual stakeholder roundtables	Formal consultation and SEP feedback sessions
Grievance Redress Mechanism (GRM)	Option to submit SEP-related improvement ideas via grievance system	Integrated in regular GRM reporting
Stakeholder Advisory Committee	Inclusion of civil society, community, student reps	Reviews SEP relevance at biannual strategic meetings

6.4 Training

SPESSE Implementing agencies will arrange necessary training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with stakeholder grievances as per the Public Grievance Procedure.

Project contractors and selected representatives will also receive necessary instructions for the Grievance Procedure.

References

1. Constitution of the Federal Government of Nigeria (1999), stakeholder engagement provisions, Chap 2 Section 14(2) (C)

2. Draft Stakeholder Engagement Plan (2019), Sustainable Procurement, Environmental and Social Standards

3. World Bank (2025). Concept Memorandum Document for the Nigerian SPESE Additional Financing

ANNEX 1: HIGHLIGHTS OF CONSULTATIONS AT THE PROJECT APPRAISAL STAGE

The Ministry of Women Affairs have the mandate to advise government on social issues including women protection and safety, Gender base violence, sexual health and protection, women right to work and working conditions, child labour, etc. During consultation with the Ministry of Women Affairs and Social Development (MWASD) the following issues were identified and discussed:

- Women inclusion and opportunity for even participation in the SPESSE project;
- Gender based violence, sexual exploitation and harassment against women and girls and how SPESSE project will guide against such in this project;
- Labour influx and how to ensure that it is reduced or not pose a threat to women health and participation in SPESSE, either as workers or students;
- Child labour occurrences during construction stage and how SPESSE project will avoid or manage this situation it its project;
- Waste generation types from the project and how SPESSE will manage wastes
- Mandate of MWASD and its capacity to implement its social responsibilities as will be assigned in SPESSE project

The consultation concluded the need to train staff of the MWASD and in particular, the importance of ensuring that the PIU at all levels are fortified with skilled personnel that will carry out mandates on GBV/SEA, labour influx, child labour, grievance redress and other social safeguards concerns.

Highlights of Consultation with the EA Department of the Federal Ministry of Environment

The EA department has the mandate to regulate EIA and ensure compliance with guidelines and laws on environmental protection. It reviews EIA reports and gives approvals to EIAs. It also penalizes defaulters of EIA laws and is responsible for approving the disclosure of draft EIAs and ESMPs prepared for projects in Nigeria.

Consultation with EA department focused on the following aspects:

- Quality of ESIAs/ESMPs submitted for disclosures in World Bank funded projects. The EA department wants World Bank as the clearing institution to ensure that reports meet international standards at all times;

- The EA department want to be carried out more meaningfully in the preparation and monitoring of projects;

- The EA department assured of its commitment to participate in projects funded by the Bank to ensure facilitation and standards.

Highlights of Consultation with NUC

The NUC plays vital role in the overall E&S management of the SPESSE Project. This is anchored on the fact that the Center of Excellence will be supervised directly by the NUC.

Discussion with NUC focused on the following thematic issues:

- World Bank ESS relevant to the project and the role of NUC;
- Coordination of ESF management
- Stakeholder consultation, grievance redress mechanism and GBV management

Summary of Stakeholder Workshop held at NUC, Abuja

Date of Stakeholder Workshop	27th August, 2019
Venue	Idris Adbulkadir Audotorium, National Universities Commission, 26, Aguiyi Ironsi Street, Maitama, Abuja.
Participants	NUC, World Bank, Federal Ministry of Finance, Federal Ministry of Women's Affairs and Development, Federal Ministry of Environment, Civil Society Organizations, Academia,
Highlights of Discussion	Stakeholders were introduced to the Environmental and Social Management Framework (ESMF). The ESMF was described as an instrument used to identify and manage the environmental and social risks of a project. The ESMF provides guidelines and procedures to be followed in preparing and implementing site specific ESMP by the respective CoEs. Stakeholders were informed about the various World Bank standards that are relevant to the SPESSE project. They were informed that the project is a low risk project on the account of no new construction being envisaged in the CoEs facilities however, environmental and social risks were anticipated which include but not limited to: • Risk of air pollution from poor handling of rehabilitation debris in the center of excellence • Noise pollution risk from movement of heavy duty vehicle during rehabilitation works • Poor waste management of electronic and rehabilitation wastes. • Gender based violence issues from exposure of students to construction workers • Gender discrimination inhibiting female participation in the SPESSE project. • Theft of procured materials. Participants were informed that the various proposed mitigation strategies for the identified risks will be contained in the ESMF document and disclosed for public accessibility and input in accordance to the guideline of Federal Ministry of Environment and also at the World Bank external website.

Questions and Concerns	The questions and concerns raised by the participants are as follows; • Project considerations about the issues of climate change • What will be done about the electronic wastes

	• What are the mitigation strategies adopted for the identified risks • What is the level of engagement of the stakeholders • How do we ensure attitudinal change towards environmental management in Nigeria?
How questions and Concerns were addressed	• Since the project is a low risk project, it is not envisaged that activities during implementation will contribute to climate change issues. However, activities such as burning of e-waste and debris will be avoided through good waste management practices which shall be enshrined in the ESMP to be prepared by the CoEs during implementation. • The mitigation strategies for the various identified risks are contained in the ESMF document which would be made available to the public during public disclosure. • Concerning e-waste disposal, the ESMF recognizes that when the specific sites and type of activities and volume of e-waste from the project would have been known in sufficient details, each implementing agency will prepare a waste management plan as an annex of the ESMP instrument required for safeguard implementation. • On the issue of attitudinal change regarding environmental and social standards, the CoEs are committed by the ESMF/ESMP to demonstrate compliance and commitment in implementation of mitigation measures which will give rise to good practices and change.
Summary/Conclusion	A participant from a representing civil society organization stated how they can be utilized in capacity building especially on social issues, through volunteer work. Addition of disaster risk management into the ESMF was suggested but the likelihood of it occurring in the existing universities is low and unlikely as no history or pattern of such is known in the participating CoEs. It was agreed that further comments or suggestions can still be added when the project documents like the ESMF, SEP have been publicly disclosed. Participants expressed their appreciation of the future impacts the project will have on development in Nigeria.

Annex B: LIST OF STAKEHOLDERS CONTACTED DURING THE UPDATE OF THE ESMF/SEP

SPESSE UPDATE of ESMF & SEP:
LIST of PEOPLE CONTACTED/INTERVIEWED
VIA VIRTUAL PLATFORM

S/N	NAME	DESIGNATION	INSTITUTION
1	Prof. S.O. Adejoh	DCL	UNI-LAG
2	Dr Temitope Owolabi	E&S Officer	UNI-LAG
3	Dr Johnbosco Umunnakwe	E&S Officer	FUTO
4	Sarah Umeh	GBV Officer	FUTO
5	Dr Jibril Mohammed	E&S Officer	ATBU
6	Prof Deborah Boryo	GBV Officer	ATBU
7	Dr Chris Eche	DCL	FUAM
8	Mac Samuel Ugbaa	E&S Officer	FUAM
9	Prof Emecho Egbe-Okpenge	GBV Officer	FUAM
10	Prof Dahiru Danwata	E&S Officer	ABU
11	Prof Eugenia Akpa	GBV Officer	ABU
12	Dr Seghosirie Animetu	E&S Officer	Uni-Ben
13	Nowogn Onoh	SSO	Uni-Ben
14	Peter O. Tobrise	Project Mgt. Officer	NUC
15	Onyinye Akauba	GBV Officer	NUC

Annex C: GALLERY OF PICTURES OF CONSULTATIONS WITH STAKEHOLDERS DURING IMPLEMENTATION MEETINGS

Picture showing Stakeholders During E&S Training Workshop in August 2023

Picture taken during stakeholder consultation at GBV Workshop at NUC, Abuja

Picture taken during one of the stakeholder consultations