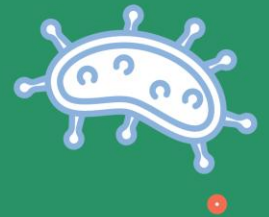


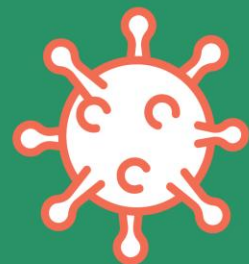


THE NIGERIA CENTER FOR DISEASE
CONTROL AND PREVENTION



Health Security Program (P508003)

STAKEHOLDER ENGAGEMENT PLAN (SEP)



FEDERAL MINISTRY OF
HEALTH

JULY 2025

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Abbreviations & Acronyms

AMR	Anti-Microbial Resistance
BFGRM	Beneficiary Feedback Grievance Redress Mechanism
CE	Citizen Engagement
CERC	Contingency Emergency Response Component
CFRN	Constitution of the Federal Republic of Nigeria
CMC	Case Management Center
CPF	Country Partnership Framework
CSR	Corporate Social Responsibility
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRC	Environmental and Social Risk Classification
ESS	Environmental and Social Standard
FELTP	Field Epidemiology and Laboratory Training Program
FGN	Federal Government of Nigeria
FME _{Env}	Federal Ministry of Environment
FMA	Federal Ministry of Aviation
FMD	Federal Ministry of Defense
FMF	Federal Ministry of Finance
FMoH&SW	Federal Ministry of Health and Social Welfare
FMLD	Federal Ministry of Livestock Development
FMOW	Federal Ministry of Works
FMWR	Federal Ministry of Water Resources
FSS	Financial Self-Sufficiency
GBV/SA	Gender Based Violence and Sexual Assault
GON	Government of Nigeria
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HeSP	Health Security Program
IDPs	Internally Displaced Persons
IEC	Information, Education and Communication
IHR	International Health Regulations
INEHSS	Integrated National Environmental Health Surveillance System
IPC	Infection Prevention & Control
IPF	Investment Project Financing
JEE	Joint External Evaluation
LGA	Local Government Area

LMIS	Logistic Management Information System
LMP	Labour Management Procedure
MDA	Ministries, Departments and Agencies
MOLGA	Ministry of Local Government Affairs
MOLS	Ministry of Lands and Survey
NADIS	National Animal Diseases Information System
NAPHS	National Action Plan for Health Security
NCDC	Nigerian Centre for Disease Control and Prevention
NGO	Non-Governmental Organization
NIN	National Identification Number
NPCU	National Project Coordination Unit
NRLM	National Rural Livelihood Mission
ONSA	Office of the National Security Adviser
PAR	Portfolio at Risk
PCU	Project Coordination Unit
PDO	Project Development Objective
PHEM	Public Health Emergency Management
PMIS	Project Management Information System
PVAC	Presidential Initiative for Unlocking the Healthcare Value Chain
PVS	Performance of Veterinary Services
POE	Point of Entry
RAP	Resettlement Action Plan
SBCC	Social and Behavior Change Communication
SAPHS	State Action Plan for Health Security
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SMOA	State Ministry of Agriculture
SMEEnv	State Ministry of Environment
SMOF	State Ministry of Finance
SMoH	State Ministry of Health
SMOLD	State Ministry of Livestock Development
SMOW	State Ministry of Works
SORMAS	Surveillance Outbreak Response Management and Analysis System
SPCU	State Project Coordination Unit
STEP	Systematic Tracking and Exchange in Procurement
WASH	Water, Sanitation, and Hygiene
WB	World Bank
WBG	World Bank Group

Executive Summary

Background

The Health Security Program (HeSP) will build on the federal government of Nigeria's policies to strengthen the nation's capacity to prevent, detect, and respond to public health emergencies despite daunting challenges and endemicity of numerous epidemic prone infectious diseases and other vulnerabilities locally at the national and subnational levels, cross border events from neighboring countries and globally pandemics.

Project Description

The HeSP offers a \$300 million credit as an investment project financing (IPF) from the World Bank (WB) with regional engagement in west and central Africa to help strengthen the preparedness of human, animal, and environmental health systems to mitigate risks and improve the overall response actions and quality of services provided during a public health event. The operation will support several health system functions including the institutionalization of appropriate governance systems and mechanisms to upscale prevention, detection, and response to public health emergencies. Nigeria is currently preparing phase 4 in the HeSP regional project.

The HeSP will: (i) strengthen governance; (ii) improve One Health collaboration; (iii) enhance surveillance and lab capacity; (iv) expand emergency response; (v) improve program management, in addition to addressing several national priorities, the HeSP also directly supports the objectives of the WB country partnership framework for Nigeria in the period of FY21-FY25. Under pillar 2, the operation directly contributes to the attainment of objective 3 on improving primary healthcare and health system resilience. The interventions to support core public health functions and capacities at the federal and state levels will provide the country with the necessary tools to prevent, detect, and respond to public health emergencies avoiding the risk of reversing years of improved health outcomes and human capital gains as a result of a public health event. Additionally, the program is also aligned with the regional integration and one World Bank Group (WBG) principles embodied in the Country Partnership Framework (CPF).

Project Component

The Project has 5 components with subcomponents listed below:

- Component 1: Prevention of Health Emergencies
 - Subcomponent 1.1: Health Security Governance, Planning, and Stewardship
 - Subcomponent 1.2: Scaling up One Health Agenda and Combatting AMR
- Component 2: Detection of Health Emergencies
 - Subcomponent 2.1: Collaborative Surveillance
 - Subcomponent 2.2: Laboratory Quality and Capacity
 - Subcomponent 2.3: Multidisciplinary Human Resources for Health Emergencies
- Component 3: Health Emergency Response
 - Subcomponent 3.1: Health Emergency Management
 - Subcomponent 3.2: Health Service Delivery for Health Emergencies
- Component 4: Program Management and Institutional Capacity
- Component 5: Contingency Emergency Response Component (CERC)

Overview of the SEP

The preparation and implementation of this Stakeholder Engagement Plan (SEP) for the HeSP satisfies the WB Environment and Social Safeguard (ESS) 10 (stakeholder engagement and information disclosure) requirement as well as addressing the need for open and inclusive engagements with all affected, vulnerable, and other interested parties. This SEP describes critical processes to identify, communicate, engage with stakeholders throughout the lifecycle of the project enhancing acceptance and quality of project implementation. Specifically, the SEP has the following objectives:

- To develop the procedure for effective stakeholder engagements through the project's lifecycle
- To identify the key stakeholder groups
- To facilitate accessible grievance for stakeholder feedback and dispute resolution
- To identify the needed resources and timeframe to achieve effective participation in each stage of the process
- To ensure information disclosure

Regulatory Framework and Stakeholder Mapping

This SEP builds on previous engagements in the human, animal, and environment health sectors and the outcome of consultations with different groups of stakeholders at the national and subnational levels. The SEP also reviewed the local and international regulatory framework and codes guiding freedom of information, citizen's engagement, disclosure of public information, and adequate response to concerns and grievances raised on key governance and decision actions. This SEP reviewed relevant legislations, policies, and international codes including: the constitution of the federal republic of Nigeria as amended, the freedom of information act, environment impact assessment act, urban and regional planning act, Nigeria center for disease control and prevention act, and the WB ESS 10 framework.

This SEP analyses and categorizes stakeholders into 3 groups namely the affected, the vulnerable, and other interested parties. This SEP estimates there will be up to 22 million direct beneficiaries of the HeSP across all 36+1 states in Nigeria describing a list of affected persons including: public health officials and authorities, healthcare providers, patients and communities, emergency responders, laboratory and research personnel, non-governmental organizations, at risk populations including children, elderly, immuno-compromised persons, suppliers and manufacturers of medical supplies, local businesses, environment, and animal health workers. Identified vulnerable parties include children, the elderly, people living with disabilities, people living in hotspot of diseases, people living in extreme poverty and internally displaced persons.

This SEP also identified other interested parties including actors within federal and State ministries of defense, aviation, finance, information, health, environment, livestock development, agriculture, transportation, traditional rulers, religious/faith-based organizations, NGOs, etc. All stakeholders were also mapped implementers and influencers assisting with the ascription of roles, responsibilities, and potential relevance to the project.

Scope, Purpose and Timing of Stakeholder Engagement

This SEP defined the scope, purpose, and timing for stakeholder engagement across the lifecycle of the HeSP and provides a system for preparation, planning, participation and discharge of roles and functions in a manner that does not duplicate or clash with other parties' roles. This will also ultimately improve resource efficiency as all stakeholders may not be engaged at the same time or frequency. When planning for stakeholder engagement events, messaging must consider average level of education, cultural factors, appropriate medium of engagement, availability of resources, population of stakeholders expected, and the health protocol guiding congregation of people.

The stakeholder engagement process is designed to envisage the following outcomes:

- Strengthened development outcomes through effective partnerships
- Plan of actions that clearly identify the means and frequency of engagement of each stakeholder
- Defined roles and responsibilities of all stakeholders and their participation in the complete project cycle ensured
- Appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format taking special consideration for the disadvantaged or vulnerable groups
- Recognized and effectively addressed potential constraints and conflicts that could affect effectiveness
- Capacity building program for stakeholders as well as implementing agencies
- Provision of meaningful access to discussion and decision making in development processes
- Adequate feedback and monitoring mechanism to ensure the project is attaining its intended results and detects potential unintended consequences
- Information disclosure

Stakeholder Engagement Consultations

At appraisal phase, stakeholder consultations were consulted at the national level across federal ministries of health and social welfare, environment, and livestock development to ministers and top management officials on the scope, institutional arrangements, and implementation of the HeSP in Nigeria and at the subnational level to 6 representative states across the 6 geopolitical zones. These consultations happened in Enugu (SE), Ondo (SW), Sokoto (NW), Borno (NE), Delta (SS), and Nasarawa (NC). The consultations which engaged state commissioners and top public sector management official for health, agriculture, and environment, community-based organizations, religious and traditional leaders, and representatives of communities where project activities are anticipated to discuss the HeSP, and the portended positive and negative impacts and how these affect the stakeholders. During the engagement, potential risks and hazards were logged and summarized in the table below

#	Intervention	Key Stakeholder-identified Risk Drivers	Critical Management Gaps	Indicative Risk Category*	Follow-up Action
1	Construction of 1 warehouse and 6 regional laboratories / upgrade state public-health laboratories	Customary- land disputes; biomedical & chemical waste; flood exposure	Ancillary-staff OHS; functional GRM absent in some states	Substantial	Implementation of the Environmental and Social Management Plan for the new construction; implementation of the Environmental and Social Code of Practice for the upgrade and expansion works; laboratory-

					specific Waste- Management Plan (WMP); full GRM roll-out
2	Build / expand warehouses & offices	Sitting conflicts; construction waste; high utility demand	Patchy energy / water-efficiency plans; GRM inconsistency	Moderate	Site-specific ESMP; incorporate resource-efficiency design
3	Mobile laboratories for remote surveillance	Road-safety hazards; spill response; corridor insecurity	Contingency drills; psychosocial-support plan; GRM gaps	Moderate → Substantial (context-driven)	Mobile-Lab Bio-risk & Security Plan; fatigue-management protocol
4	Flood-protection, WASH & emergency works	Altered hydrology; inequitable service access	Climate-resilient design is missing in some states	Moderate → Substantial	Hydrological modelling; resilience- design checklist
5	Veterinary points of entry (PoE)	Habitat disturbance; disinfectant run-off; informal-trade disruption	Cross-border emergency plan; GRM gaps	Moderate → Substantial	Joint border-health ESMP; livelihood-impact mitigation
6	Third-party logistics (3PL) for specimen referral	Corridor insecurity; spill risk; regional service inequality	Contract-compliance monitoring; GRM gaps	Moderate	3PL E&S clauses; corridor risk assessment
7	Sample-collection & transport materials	Single-use plastics; chemical-preservative hazards	End-of-life plan; inventory resilience; GRM gaps	Moderate	National disposable-materials WMP; procurement-system upgrade
8	Expanded sample-transport network & reagents	Fuel emissions; reagent disposal; supply inequity	Inventory & workforce deficits; GRM absence (some states)	Moderate	Logistics climate- footprint plan; staff capacity-building

Stakeholder Expectation Management

This SEP also reviewed stakeholder expectation management principles for effective engagement and factors that influence such expectations including cultural influences, ethical factors, political dynamics, and sentiments. In addressing such expectations, the SEP guiding the underlisted approach:

- Conducting adequate awareness, sensitization, and consultation on the scope, identified risks, and impact of the project and its intended results
- Ensure that engagement is accessible and managed so that it is culturally appropriate
- Location of meetings at venues not far from where participants reside or are responsible for logistics and mobilization of participants
- Ensure adequate and timely information and opportunities are provided to all stakeholders to facilitate their involvement
- Engender transparency through information disclosure and prevention of elite hijack
- Ensure vulnerable and minority groups are consulted separately using culturally appropriate language and medium of communication

The following steps were also advised during community entry: authorization through approval from

government/community leadership, engagement with leaders, community interaction, collecting feedback and grievances, and providing final information based on feedback. While advised to use existing engagement plans, a program engagement plan was also prepared highlighted below.

Project Preparation	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Responsibility
Project Preparation	Preparation and disclosure of all Environmental and Social Instruments – ESMP, Labour Management Procedure, Stakeholder Engagement Plan, Environmental and Social Commitment Plan	All stakeholders	All documents will be published on the Ministry of Health and Ministry of Environment websites	June 2025	NPCU
Project preparation	A designated and manned telephone line will be set up at the NPCU and SPCU that can be used by the public to make complaints and grievances, obtain information, make enquiries, or provide feedback on the Project.	Project affected persons, and any other stakeholders and interested parties	Dedicated hotline Ministry of Health – Federal and State	Throughout Project implementation	NPCU/SPCU
Project Identification	Advance announcement of commencement of major project activities, grievance Redress Mechanism, advertisement for levels	Local community within the project areas, County Authority	Community townhall –	January 2026	Environmental Health Officer
Project Implementation	<ul style="list-style-type: none"> • Convey general information on the project, detail discussion on sub project activities, project environmental and social risk and mitigation measures, provide update on implementation progress to local, regional and national stakeholders. • Present project information to the group of stakeholders • Allow the group of stakeholders to provide their views and opinions • Use participatory exercises to facilitate group discussions, brainstorm issues, analyze information, 	Project affected community, Hospitals, Health Facilities, laboratories, Vulnerable individuals, Community, Farmers, Livestock Traders, Port Officers, Veterinary officers	Town hall meeting	Throughout the duration of the Project	Environmental Health Officer

	and develop recommendations and strategies Recording of responses				
During Implementation	Distribution of project information to government agencies, organizations and Institutions of research. Invite stakeholders to meetings	Government officials, NGOs, Development partners, County, Port of Entry, Health Facility	Correspondence by email, phone, written communication	Throughout Project implementation	NPCU/SPCU
During Implementation	Share information on timing of location, clearance, potential impacts and proposed mitigation measures.	Vulnerable individuals, Community, Farmers, Hunters Livestock Traders	Direct communication with affected Health facilities for the rehabilitation works and new construction	Throughout Project implementation	NPCU/SPCU
Project Completion	Will be used to solicit views and opinions on project impacts and solutions	Vulnerable individuals, Community, beneficiaries	Interviews	During project implementation in the counties at end of the project	Project implementation Team

Beneficiary Feedback Grievance Redress Mechanism

When disputes occur, the SEP proposes a beneficiary feedback grievance redress mechanism as an alternate dispute resolution arrangement outside the judicial system for aggrieved parties. The redress mechanism will be implemented using a guideline which will propose resolution measures for different grievance categories described below

- Category 1- Wrongful inclusions/exclusions
- Category 2- Payments
- Category 3- Service delivery (including quarantine, facility-/community-based service delivery issues)
- Category 4- Fraud and corruption issues
- Category 5- Inquiries/information request
- Category 6- Gender based violence
- Category 7- Others

Once possible resolution models have been proposed without satisfactory resolution of issues, legal recourse can be sought. When grievances occur, the table below describes a stepwise action plan.

Steps	Process	Description	Completion Time frame	Responsible Agency/ Person
1	Receipt of complaint	Document date of receipt, name of complainant, village, nature of complaint, including the medium of receipt (online, SMS, hotline, complaint box) inform the SPCU	1 day	Secretary to GRC at project level
2	Acknowledgement of grievance	By letter, email, phone	1-5 days	Social safeguard officer at SPCU

3	Screen and Establish the Merit of the Grievance	Visit the site; listen to the complainant / community; and assess the merit	7-14 days	GRC including the social safeguard officer & the aggrieved PAP or his/her representative
4	Implement and monitor a redress action	Where complaint is justified, carry out resettlement redress in line with the entitlement matrix/ESS5	21 days or at a time specified in writing to the aggrieved PAP	PC-NPCU and Social Safeguard Officer
5	Extra intervention for a dissatisfied scenario	Review the redress steps and conclusions, provide intervention solution	2-3 weeks of receiving status report	PC-NPCU
6	Judicial adjudication	Take complaint to court of law	No fixed time	Complainant
7	Funding of grievance process and GBV/SEA (10 percent of ES budget)	GRC logistics and training, redress compensation, court process	No fixed time	The proponent

SEP Budgeting

The PCUs will prepare stakeholder engagement budgets and keep a log of all grievances recorded on the project which will be reported monthly to the World Bank periodically. Minutes of all stakeholder meetings will also be forwarded to the World Bank on a periodic basis using a template provided in this SEP. It is estimated that during the implementation of the HeSP, about USD350,000 will be expended on stakeholder engagement activity.

CHAPTER 1: PROJECT DESCRIPTION

1.1 Background

The Health Security Program (HeSP) will build on the Federal Government of Nigeria's policies and programs that strengthen the nation's capacity for surveillance, laboratory diagnosis, preparedness, and public health emergency response. Nigeria is continually facing public health emergencies stemming from endemic infectious diseases and emerging threat events, as well as vulnerabilities to infectious diseases from neighboring countries and global sources and this is continually straining its already fragile health system. In recognition of the threats posed by disease outbreaks and the challenges in its core capacities, the Federal Government of Nigeria (FGON) has sought to enhance its capacity to prepare for, rapidly detect, and respond to public health events through its relevant national and subnational implementing entities. The Health Security Program (HeSP) directly promotes these objectives by supporting the Government of Nigeria (GON) in strengthening its capacity to prepare for and respond to health emergencies within the nation.

The HeSP is an Investment Project Financing (IPF) from the World Bank (WB) with regional engagement in west and central Africa to help strengthen the preparedness of the health, animal, and environment systems to mitigate risks and improve the response actions and quality of care provided to people exposed to public health threats. These goals will be achieved through the establishment of governance reforms including public health legislations, policies, and financing which will guide statutory public health and health security functions, institute measures and mechanisms to upscale prevention, detection, and response to public health emergencies including climate events. Nigeria is currently preparing for the implementation of HeSP phase 4 which is concurrent being designed with phases 2 and 3 of the regional program.

The project will support the improvement of early warning and surveillance systems, preparedness and response actions, expansion of human resources for health security, and the expansion of current laboratory and diagnostic capacities at the national and subnational (State and Local Government Area (LGA)) levels. The program will also support clinical care/case management capacity by funding equipment and supplies for case management centers (CMCs) in designated hospitals, along with the provision of Personnel Protective Equipment (PPE) and infection control supplies and measures in hospitals and primary health care (PHC) facilities. Support will also be provided to strengthen the collection and logistics for medical samples as well as the disposal of medical waste.

The HeSP directly supports the objectives of the World Bank's (WB) Country Partnership Framework (CPF) for the Federal Republic of Nigeria for the period FY21-FY25 which was approved on November 16, 2020. Under Pillar 2; Investing in Human Capital and Harnessing Nigeria's Demographic Dividend, the proposed operation directly contributes to the attainment of CPF Objective 3: Improving Primary Healthcare and health system resilience. The interventions to support core public health functions and capacities at federal and state levels will provide the country the necessary tools to prevent, detect, and respond to public health emergencies, avoiding the risk of reversing years of improved health outcomes and human capital gains due to infectious disease outbreaks. Additionally, the program will also be aligned with regional integration and

One World Bank Group (WBG) principles embodied in the Country Partnership Framework (CPF).

1.2 Project Components

The HeSP will have five components that are grounded in the IHR core capacities, which all countries are committed to strengthening. The components will specifically address the gaps identified as priorities in the health security blueprint developed by the Government of Nigeria (GON).

Component 1: Prevention of Health Emergencies. This component aims to scale up the country's capacities to prevent health emergencies through strengthened planning and management of health security resources and preventing and minimizing the impacts of health threats such as zoonoses and Anti-Microbial Resistance (AMR).

Subcomponent 1.1 Health Security Governance, Planning, and Stewardship. This subcomponent will support the country's prioritization, coordination, regulation, management, and monitoring of the health security agenda, at Federal and state-levels, including risk and hazard assessments and the development and management of the National Action Plan on Health Security (NAPHS) and the State Action Plans for Health Security (SAPHS). This subcomponent will support the development of Public Health Emergency funds especially at the state level; and the monitoring of International Health Regulation (IHR) core capacities using tools such as the Joint External Evaluation (JEE) and Performance of Veterinary Services (PVS) Pathway.

Subcomponent 1.2 Scaling-up One Health Agenda and combating AMR. This subcomponent is dedicated to fostering multisectoral collaboration within the One Health approach. It emphasizes AMR and climate-sensitive diseases such as malaria, dengue, and Lassa fever. The supported activities will align with the objectives and priorities of the country's National Action Plan for Antimicrobial Resistance 2024-2028, which covers the following six objectives: (i) Governance; (ii) Awareness and Education; (iii) Surveillance; (iv) Infection Prevention & Control (IPC); (v) Stewardship; (vi) Research and Development.

Component 2. Detection of Health Emergencies. This component aims to strengthen the capacities required to predict and timely detect possible health threats through multisectoral surveillance systems and mechanisms for data sharing within and across borders, strong national and subnational laboratory networks and the multisectoral and integrated workforce required to enable early detection of health emergencies.

Subcomponent 2.1. Collaborative Surveillance. This subcomponent will focus on strengthening multisectoral and integrated surveillance capacities including both indicator and event-based surveillance, particularly for epidemic-prone diseases, climate-sensitive diseases, and unusual events reported by health actors. With previous support from the World Bank, the country has established and deployed the Surveillance Outbreak Response Management and Analysis System (SORMAS) as the primary surveillance platform for human health. Similarly, the National Animal Disease Information Service (NADIS) and the Integrated National Environmental Health Surveillance System (INEHSS), were set up for animal health and environmental health surveillance, respectively. This subcomponent will support the full deployment and interoperability of these platforms up to the local government area (LGA) level.

It will also support real-time monitoring and quality improvement activities for early detection and response, such as the 7-1-7 target, and operationalize early warning surveillance systems

across One Health sectors (animal, environment, and human health). Program supported activities will also include training and logistics support (i.e., transport) to strengthen capacity for event verification, investigation, and risk assessment to inform the level of threat and response. This will also strengthen cross-border collaboration through participation in regional surveillance networks, enhanced partnerships with neighboring countries.

Subcomponent 2.2. Laboratory Quality and Capacity. This subcomponent will focus on enhancing the coverage and quality of laboratory systems to ensure timely and accurate identification and characterization of pathogens. Proposed activities will support the adoption and implementation of regional laboratory protocols, referral and transport systems, necessary laboratory infrastructure and laboratory supplies for testing priority diseases. This subcomponent will also support activities that aim to strengthen laboratory quality management systems, support public health laboratory accreditation efforts, and expand laboratory and diagnostic coverage. This project will support the coordination of laboratory information systems for human, animal, and environmental health. Expanded laboratory capacity would also focus on the ability to carry out surge testing (across One Health sectors) and expand capacity for genomic sequencing.

Subcomponent 2.3. Multi-disciplinary human resources for health emergencies. This subcomponent aims to strengthen workforce capacities – across the spectrum of human, animal, environmental, and public health. Proposed activities include support to the implementation of harmonized competency standards, education and training programs, including continuous support to support human resource capacity development programs including the Field Epidemiology and Laboratory Training Program (FELTP), Public Health Emergency Management (PHEM) Training, among others at national and subnational levels, and regional health emergency response teams.

Supported activities will also focus on strategic resource planning to support medium to longer term staffing, including multidisciplinary One Health workforce plan development and implementation. **Component 3. Health Emergency Response.** This component aims to build and sustain capacities that can prevent an outbreak from becoming an epidemic or pandemic, through a focus on disease control and effective health emergency response.

Subcomponent 3.1. Health Emergency Management. This subcomponent aims to further enhance national and subnational capacities for managing and responding to public health emergencies as required. Specifically, the project will support the updating, monitoring, and implementation of the country's multi-hazard, multi-sectoral plans. It will also bolster emergency response management through simulation exercises, intra-after-action reviews, and similar activities at the subnational level. Additionally, the project will support the assessment and upgrading of Public Health Emergency Operation Centers to meet standards in all 36 states and the Federal Capital Territory as well as establish command centers in each LGA. Furthermore, it will expand capacity for warehousing, Logistics management, including a Logistics Management Information Systems (LMIS), and stockpiling for the rapid deployment of medical countermeasures nationwide. This includes collaboration with the Presidential Initiative for Unlocking the Healthcare Value Chain (PVAC) to potentially support the local manufacturing of essential commodities for public health emergency response.

Subcomponent 3.2. Health service delivery for health emergencies. This subcomponent aims to enhance the health system's capacity to respond to public health emergencies, ensuring the continuity of essential health services during such crises. This subcomponent will facilitate

the comprehensive rollout of the epidemic-ready health facilities initiative. Activities will include conducting assessments and implementing green upgrades for PHC facilities; investing in climate smart measures and IPC requirements; enhancing adaptability for surge capacity, including improvements of Water, Sanitation, and Hygiene (WASH) facilities, isolation areas, ventilation, and electricity. The program will also support the development of contingency plans, the establishment of patient referral systems and networks of facilities to be activated during health crises, and the adoption of innovative solutions such as telemedicine. Additionally, the project will strengthen information systems and promote community and private sector engagement in response efforts.

Component 4. Program Management and Institutional Capacity. This component will support the critical aspects of program management and institutional capacity necessary for the successful implementation of the HeSP program in Nigeria. Specific institutional support will be provided to NCDC as necessary to enable it to perform its role as the secretariat of the National Project Coordination Unit (NPCU) and the lead public health agency in the country. This component will also cover support for program coordination at both national and subnational levels, including steering committee and technical committee meetings, as well as supervision visits. It will also provide technical assistance for improved management in areas including financial management, procurement, social and environmental risk management, and monitoring and evaluation. Additionally, this component will finance personnel (consultants) for project execution at national and subnational levels as appropriate. Furthermore, it will support participation in regional exchanges for knowledge sharing and the promotion of cross-country learning in specific technical areas. Finally, this component will cover operating expenses and equipment needed for effective project implementation and management.

Component 5. Contingency Emergency Response Component. Consistent with the provision of the overall MPA design, and Investment Project Financing (IPF) Policy, paragraphs 12 and 13, for Situations of Urgent Need of Assistance and Capacity Constraints, a CERC will be included to provide immediate resources should the country experience an epidemic or outbreak of public health importance or other disasters which causes adverse economic and /or social impact, resulting in a request to the World Bank to support mitigation, response, and recovery from such an emergency. This will allow for rapid reallocation of uncommitted funds in the event of an eligible emergency as defined in OP 8.00. For the CERC to be activated, and financing to be provided, the Government of Nigeria will need to: (i) submit a request letter for CERC activation and the evidence required to determine eligibility of the emergency, as defined in the CERC Annex to the Project Operations Manual; (ii) submit an Emergency Action Plan, including the emergency expenditures to be financed; and (iii) meet the environmental and social requirements as agreed in the Emergency Action Plan and Environmental and Social Commitment Plan (ESCP).

Project Focus Areas

The project is structured around two focus areas, namely:

Focus Area 1: Enhancing health security capacity and outcomes. The focus area on improving health security capacity and outcomes rests on enhancing emergency prevention, detection, and response capacity to ensure better access to health services and improve public health standards.

Focus area 2: Strengthening health institutions and services: This focus area would seek to demonstrate an approach where the national health system is well equipped to handle emergencies,

provide health services long-term, and improve its operational capacity. This initiative will contribute to development by ensuring a resilient health service delivery.

1.3 Justification for Preparing a Stakeholder Engagement Plan (SEP) The preparation and implementation of the SEP is a requirement under the World Bank ESS10¹. The SEP addresses the need for open and inclusive engagements with stakeholders affected or likely to be affected by the project (project- affected parties), and other interested parties. It is a critical process that identifies the procedures for the project proponent to identify, communicate, and engage with people affected by its decision and activities, as well as others with an interest in the implementation and outcomes of its decisions and project. The SEP is designed to be an inclusive procedure that is required throughout the lifecycle of the project, commencing as early as possible. Effective stakeholder engagement can improve the environmental and social sustainability of the HeSP, enhancing community-level project acceptance, and contribute significantly to overall project design and implementation.

1.4 Objectives of the SEP

The objectives of the Stakeholder Engagement Plan are:

- To develop the procedure for effective stakeholder engagements throughout the project's lifecycle
- To identify the key stakeholder groups
- To facilitate accessible grievance for stakeholder feedback and dispute resolution; and
- To identify resources needed and timeframe to achieve effective participation in each stage of the process describe the stakeholder engagement process.

1.5 Expected Output

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

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

1.6 Methodology for Preparing the SEP

In preparing this SEP, literature review and high-level stakeholder consultations were conducted to reasonable satisfaction. The literature review involved the review of the Environmental and Social Management Framework (ESMF) of the existing World Bank Engagement in Nigeria including the HOPE-PHC PforR, REDISSE, CoPREP, IMPACT, the HeSP Phase 1 engagement. The SEP design team also reviewed the concept note and project information document for the HeSP Phase 4 (Nigeria), the World Bank Environmental and Social Framework (ESF) guide amongst others. Similarly, there was a stakeholder consultation with a sample of the prospective participating states, including management staff of the state steering committee such as the Ministries of

1 - Environmental & Social Framework for IPF Operations - ESS10: Stakeholder Engagement and Information Disclosure. Available at <https://documents1.worldbank.org/curated/en/476161530217390609/ESF-Guidance-Note-10-Stakeholder-Engagement-and-Information-Disclosure-English.pdf>

Health, Finance, Budget and Planning, Livestock Development, Environment, Agriculture, and Water Supply & Sanitation, and the general public including champion entities in the communities including religious leaders, opinion leaders, ward development committees as well as groups of farmers, wildlife hunters, and livestock traders and food handlers.

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

CHAPTER 2: STAKEHOLDER ENGAGEMENT REGULATORY FRAMEWORK

2.1 Introduction

This chapter is concerned with the review of national and international legal and regulatory frameworks and policies which underpin and regulate citizen's freedom of information, citizenship engagement, disclosure of public information and adequate response to concerns and grievances raised by the public on key governance and decision actions. These legal frameworks as reviewed under this section include the World Bank's Environmental and Social Standard 10 (ESS10), Constitution of the Federal Republic of Nigeria (1999), the Freedom of Information Act, 2011, the EIA Act 86 of 1992, the Urban and Regional Planning Act, Cap N138, 2004, and the National Center for Disease Control and Prevention Act, 2018.

2.2 National Legal Provisions for Citizen Engagement

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

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

2.2.2 The Freedom of Information Act

This Act derives its power from Section 39 of the CFRN. It applies not only to public institutions but also to private organizations providing public services, performing public functions, or utilizing public funds⁵. The purpose of the Act is to make public records and information more freely available, provide for public access to public records and information, protect public records and information to the extent consistent with the public interest and the protection of personal privacy, protect serving public officers from adverse consequences for disclosing certain kinds of official information without authorization and establish procedures for the achievement of those objectives. Section 1 of the Act provides that every citizen, whether adult or minor, is entitled to have access to any records under the control of the government or any public institution. Section 1(3) of the Act allows an applicant who has been refused information by a public institution, to institute proceedings in Court (Federal or State High Court) to compel the public institution to release the information sought.

Obligations that the Act imposes on Institutions include:

1. A description of the organization and responsibilities of the institution including details of

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

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

2.2.3 Environmental Impact Assessment (EIA) Act

This act provides guidelines for activities for which EIA is compulsory (such as mining operations, road development, coastal reclamation involving 50 or more hectares, Large Agricultural Projects including Livestock programs etc.). It prescribes the procedure for conducting and reporting EIAs and dictates the general principles of an EIA. The EIA act enshrines that consideration must be given to all stakeholders before the commencement of any public or private project by providing for the involvement and input of all stakeholders affected by a proposed project. For the purpose of public access to information, Section 57 of the Act requires Agencies to maintain a public registry in respect of a project. The registry shall contain all records and information produced, collected, or submitted with respect to the environmental assessment of the project, including any report relating to the assessment and any comments filed by the public in relation to the assessment. The Act also makes it compulsory for project proponents to disclose EIA reports through the Federal Ministry of Environment to all stakeholders for their easy accessibility and input. This is usually carried out through advertisement in local dailies for 21 working days and through display of such Documents at various designated Centers close to the project area such as the Local Government Headquarters and Community Town Halls.

2.2.4 Urban and Regional Planning Act, Cap N138, 2004

This Act provides that any land development plan must be disclosed to stakeholders to prove that such projects would not harm the environment or constitute nuisance to the community.

2.2.5 Nigeria Center for Disease Control and Prevention (NCDC) Act, 2018

The Act provides the legal basis for a public and private institutions to report all public health threats/events to the FGON through the NCDC. These threats include biologic and environmental hazards which are mandatory to be reported through integrated surveillance networks from the

community level to the NCDC through established networks.

2.3 World Bank Environmental and Social Standard on Stakeholder Engagement

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

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

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

The Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

CHAPTER 3: STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Introduction

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

3.2 Categorization of Stakeholders

Stakeholders were identified through review of project documents of the HeSP and further through consultation with National Project Coordinating Unit (NPCU) domiciled with the NCDC and relevant Ministries, Departments and Agencies (MDAs) of government at the national and state levels including other health implementing entities, livestock development (as well as agriculture where still applicable), and environment ministries.

Stakeholders identified for the HeSP are categorized as follows:

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

3.2.1 Affected Parties

For this SEP, the scope of beneficiaries is restricted to 22,000,000 direct beneficiaries (10 percent of the population of Nigeria) across all 36+1 states including women, children, travelers, and migrants, small hold farmers, disabled persons, among others. Project activities under components 1, 2, and 3 are likely to affect jointly all people exposed to public health threats endemic.

Below listed are groups of people who are likely to be project affected persons

- Public Health Officials and Authorities: These individuals are responsible for managing and responding to public health emergencies. They may be directly impacted by changes in protocols, resources, or information dissemination.
- Healthcare Providers: Include doctors, nurses, pharmacists, and other healthcare professionals who may be affected by changes in patient care protocols, resource allocation, or the availability of personal protective equipment (PPE).
- Community health officers, Community animal health officers, and other frontline surveillance and early warning system officers
- Residents near points of entry
- State and Local government health officials deployed to project sites
- Patients and Communities: Consider how the project may affect patients receiving medical care, as well as the communities where they reside. This may include changes in healthcare accessibility, health education programs, and public health awareness campaigns.
- Emergency Responders: Firefighters, paramedics, and other first responders may be impacted by changes in emergency response protocols and the availability of resources during health

emergencies.

- **Laboratory and Research Personnel:** Scientists, researchers, and laboratory technicians who play a role in disease surveillance, testing, and vaccine development may be affected by changes in funding, resource allocation, or research priorities.
- **Non-Governmental Organizations (NGOs):** Include organizations that provide healthcare services. They may be partners in the health security project or recipients of project resources.
- **At-Risk Populations:** Identify vulnerable or at-risk populations such as the elderly, children, individuals with chronic illnesses, or those living in congregate settings like nursing homes or correctional facilities.
- **Suppliers and Manufacturers of Medical Supplies:** Companies that produce medical equipment, pharmaceuticals, and PPE may be affected by changes in demand, regulations, or supply chain disruptions.
- **Local Businesses:** Small businesses and local economies may be impacted by changes in consumer behavior, restrictions, or lockdowns during public health emergencies.
- **Environmental and Health Workers:** Those responsible for waste disposal, sanitation, and environmental health may play a critical role in preventing disease spread.
- Additionally, other key stakeholders that are to be directly affected by the project include: the Ministry of Agriculture, Livestock farmers, livestock traders which include international traders' exportation and imputation of livestock, hunters, the immediate community that is likely affected by these activities

3.2.2 Disadvantaged/Vulnerable Individuals or Groups

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

1. Elderly people above the age of 65
2. Children under 5
3. People living in hotspots of endemic epidemic prone diseases
4. Persons with disabilities
5. People living in extreme poverty
6. Internally Displaced Persons (IDPS) / migrants
7. Women

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

3.2.3 Other Interested Parties

Under this are Stakeholders who may not be directly or indirectly impacted by the project but

have the potential interest to influence the project outcomes via their statutory functions and mandates or other factors. They include Ministries, Departments and Agencies with statutory roles in the implementation of HeSP at the federal level and in the various participating states. They are as follows:

1. Ministry of Health (MoH) (Federal and States)
2. Ministry of Livestock Development (MoLD) (Federal and States)
3. Ministry of Finance (MoF) (Federal and States)
4. Ministry of Environment (MEnv) (Federal and States)
5. Ministry of Information (MOI) (Federal and States)
6. Ministry of Transportation (MOT) (Federal and States)
7. Ministry of Aviation (MOAv) (Federal)
8. Ministry of Defense (MOD) (Federal)
9. Office of the National Security Adviser (ONSA)
10. Ministry of Agriculture (MOA) (States)
11. Ministry of Water Resources & Sanitation (MOWR&S) (States)
12. Ministry of Land and Survey (MOLS) (States)
13. Office of the State Governor
14. Ministry of Local Government Affairs (MOLGA) (States)
15. Community-Based NGOs
16. Ministry of Works (MOW) (States)
17. Traditional Leaders
18. Faith- based / religious leaders

3.3 Stakeholder Mapping and Analysis

The process of stakeholder mapping and analysis began with the review of the project documents namely, the concept note of the HeSP, and through consultation with the NPCU. Similarly, virtual consultation held with all the participating states' steering committees and state implementing structures in March 2025 were helpful in profiling the roles, capacities, and influences of the participating MDAs. The summary of consultations held with the stakeholders is annexed to this document as Appendix 2. The following are key takeaways from the consultation:

The stakeholder's engagement conducted discussed the health security legislation/framework as it relates to prevent, detect, and respond to public health emergencies across the human, animal, and environment sectors. During the engagement, stakeholders confirmed that Nigeria continues to deal with recurring outbreaks of epidemic prone diseases and there remains the global uncertainty of another pathogen of high consequence that could predispose to the next pandemic. There was also a considerable threat of zoonosis and surveillance systems in human and animal health remain porous. Participants alluded to the need to improve diagnostic capacity and preparedness systems to manage public health emergencies especially at the subnational level towards improving Nigeria's overall capacity to secure the country against biologic, environmental, and climate related threats.

The HeSP in Nigeria will take advantage of the existing structures within the NCDC, MOLD, MOE at the national and subnational levels to kickstart interventions. The project will also ensure the development and institutionalization of required action principles, accountability framework as well as State level legislations and action to upscale the health security capacity of Nigeria while

aligning with the ESF requirements and Bank directives.

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

Table 3.1 presents the lists of the stakeholders identified, their profile, interest, and role/level of relevance to the HeSP.

Table 3.1 Stakeholder Matrix showing interest and role in the project

Stakeholder Group	Profile of Stakeholder Group	Interest in the Project	Potential Role/Relevance to the Project
Interested Parties	Office of the State Governor	High Influencers	Statutory mandate as Chief executive officer of the State.
	Ministry of Health	High Influencers/Implementers	They are the core ministry involved in implementation of the HeSP. The ministry houses the project coordination units at the national and subnational levels. The ministry also largely manages the preparedness and response functions for health security in Nigeria.
	Ministry of Livestock Development	High Influencers/Implementers	They are the core ministry involved in implementation of the HeSP. The ministry manages livestock and animal development at the federal and state levels where it exists. The ministry controls and manages the outbreak of diseases in animals. The ministry also co-chair the project steering committee.
	Ministry of Finance	High Influencers	The finance ministry manages expenditure tracking and the debt portfolio of the GON.
	Ministry of Environment	High Influencers/Implementers	They are the core ministry involved in implementation of the HeSP. The ministry manages, Prevents and control Environmental health hazards and event in Nigeria including environmental related disease outbreak and climate related events. The ministry also co-chair the project steering committee
	Ministry of Transportation	High Influencers	The ministry manages Land and Sea ports/Point of Entry (POE)
	Ministry of Aviation	High Influencers	The ministry manages Airports/Point of Entry (POE)
	Ministry of Defense	High Influencers	The ministry is in charge of the overall security architecture in Nigeria
	Office of the National Security Adviser	High Influencers	The National Security Adviser oversees all forms of terrorism in Nigeria and can set up a committee/council in case of a biologic event
	Ministry of Agriculture	High Influencers/Implementers	Ministry responsible for managing the livestock development in its absence as a substantive ministry at the subnational level. Members of the State Implementation Committee.
	Ministry of Water Resources	High Influencers	They regulate access to safe and sufficient water. This ministry is responsible for water supply in States including in the rural areas. They need to be informed about project progress. Members of the State Implementation Committee.
	Ministry of Information	High Influencers	They provide citizens with credible and timely information on government activities, programmes and initiatives. They may become a useful resource during risk communications and community engagement
	Ministry of Local Government Affairs	High Influencers	They have significant presence in communities and may be engaged during community engagement activities
	Community Based NGOs	Medium Influencers	NGOs are involved in ensuring transparency and accountability, creating awareness, maintaining communication with community

	Traditional Leaders/ Faith Based Leaders	Medium Influencers	Traditional leaders need to be involved on the progress of the project in their host communities as they are key in the dissemination of information and grievance management
	Ministry of Works	High Influencers	Ministry is charged with the responsibility of providing technical services such as design, construction, and maintenance of health facilities, laboratories, etc. They need to be engaged to give necessary statutory authorizations.
Beneficiary & Affected Parties	<p>People at risk of endemic epidemic prone diseases People at risk of endemic epidemic prone diseases</p> <p>People living in areas at risk of climate or adverse environmental events</p> <p>Livestock at risk of zoonotic diseases</p> <p>Livestock farmers</p> <p>People living in host communities and Interest Groups</p>	These Stakeholder groups are either direct beneficiaries from the program or are impacted by the implementation of the project	The direct beneficiaries will be consulted and sensitized on how to optimize the benefits of the project. Potential Project Affected Persons (PAPs) shall be consulted using the plan outlined in the Stakeholder Engagement Plan. This will be done throughout the project cycle. To ensure that their views are incorporated in the implementation and execution of the project.
Disadvantaged or Vulnerable Groups	<p>Elderly people above the age of 65</p> <p>Children under-5</p> <p>People living in hotspots of endemic epidemic prone diseases</p> <p>Persons with disabilities</p> <p>People living in extreme poverty</p> <p>Internally Displaced Persons (IDPS) / migrants</p>	These Stakeholder groups are directly impacted by the project. They are important beneficiaries of the project.	This Stakeholder Group may be more adversely affected by the impact of the project than other stakeholder groups. They will be consulted using the plan specifically outlined in the Stakeholder Engagement Plan. This will be done throughout the project cycle. To ensure their views are incorporated in the implementation and execution of the project.

3.4 Stakeholder Analysis

The analysis carried out in table 3.1 above depicts the identified Stakeholders, their level of interest, nature of relationship with the project and influence on the project. The purpose is to have a clear-cut understanding of the powers and influence of the respective stakeholders which may affect project's outcome and sustainability on one side, and to also know the interest of stakeholders that lie on the critical path of project implementation with a view to deepening dialogue with the concerned stakeholders to ensure they are prioritized and mainstreamed early into the project work plan.

Influence in this SEP is defined by the stakeholder's decision-making powers, in the sense of the stakeholder's ability to make decisions that determine the project outcomes and process of implementation of the project. Power has to do with the capacity of the stakeholders to impact the implementation of the project in relation to the force they can deploy in the context of their stake holding. This force may be positive or negative. In determining strategy for engagement of stakeholders based on their interest and influence in the project outcomes, three classifications are used, namely: High, Medium, and Low as further described below.

High

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

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

Medium

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

Low

This group is lower on the decision-making scale than the High and Medium Influence Stakeholders. Even though their influence in decision making is low, these stakeholders have high interest in the project outcome. Stakeholders in this category are at the grass root level including people at risk of endemic epidemic prone diseases, people living in areas at risk of climate or adverse environment events, livestock farmers, people living in host communities for prioritized activities and interest groups who without focused assistance may not be able to participate in the decision-making process of the project. The techniques tabulated in Table 4.3 will be engaged as further effort to ensure that the vulnerable among this category are adequately engaged. The plan is to fully engage this group and apply all efforts to ensure that they are satisfied and fully always informed of the project development. The project will maintain this group's interest in the HeSP. This will be done by:

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

Table 3.2 Showing Stakeholder Analysis/Profiling

NO	Stakeholders	Influence	Nature of Relationship with Project	Interest
1	Office of the State Governor	High	Influencers	High

2	Ministry of Health	High	Implementation	High
3	Ministry of Livestock Development	High	Implementation	High
4	Ministry of Finance	High	Implementation	High
5	Ministry of Environment	High	Implementation	High
6	Ministry of Agriculture	High	Implementation	High
7	Ministry of Water Resources & Sanitation	High	Implementation	High
8	Ministry of Information	High	Implementation/Awareness	High
9	Ministry of Local Government Affairs	High	Access Support	High
10	Community Based NGOs	Medium	Community Engagement, Transparency, Accountability.	High
11	Traditional Leaders/Faith Based Leaders	High	Community Engagement, Transparency, Accountability.	High
12	Ministry of Works	High	Support	High
13	people at risk of endemic epidemic prone diseases, people living in areas at risk of climate or adverse environment events, livestock farmers, people living in host communities for prioritized activities and interest groups	Low	Direct beneficiaries and impacted parties	High
14	Vulnerable / Disadvantaged Groups	Low	Directly impacted	High

CHAPTER 4: STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Introduction

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

4.2 Purpose and Timing of Stakeholder Engagement Program

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

Engagement with Stakeholders will be throughout the life cycle of the project and this SEP provides a system necessary for preparation, planning, participation and discharge of roles or functions in a manner that does not duplicate or clash with other parties' roles. This also minimizes resources spending and channels them to areas of deficit and demand. Engagement will occur at preparation, implementation, and monitoring stages, using adapted formats for literacy and language.

4.3 Nature, Scope, and Frequency of Stakeholder Engagement

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

4.4 Expected Outcome / Purpose of the Engagement Process

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

- Strengthened development outcomes through effective partnerships
- Plan of action that clearly identifies the means and frequency of engagement of each stakeholder
- Identified roles and responsibility of all stakeholders and their participation in the complete project cycle ensured
- Appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format taking special consideration for the disadvantaged or vulnerable groups.

- Recognized and effectively addressed potential constraints and conflicts that could affect effectiveness
- Capacity building program for Stakeholders as well as implementing agencies.
- Provision of meaningful access to discussion and decision making in development processes.
- Adequate feedback and monitoring mechanism to ensure the project is attaining its intended results and detects potential unintended consequences
- An avenue for information disclosure.

4.5 Summary of Risk Profile based on Stakeholder Engagement and Consultations across the 6 geo-political zones

Stakeholder consultation exercise was conducted in 6 states representing the six geo-political zones of Nigeria. The stakeholders engaged included affected parties, the poor and vulnerable and other interested parties including state ministries of agriculture, environment, labour, civic society organisations, among others. The methodological approach used to prepare the summary of risk profiles (table 4.1 below) follows the guidance below:

- A risk driver is logged when participants confirm that a specific hazard is relevant to a planned intervention on the HeSP in their context
- A management gap is flagged when stakeholders agree that the safeguard, budget, or technical capacity needed to control that hazard is absent, weak, or unverified

Risk categories follow the World Bank ESF proportionality guidance, the following are how risks were categorized:

- Substantial – multiple high-impact drivers and critical gaps
- Moderate – discrete drivers or moderate gaps correctible with routine measures
- Low – minor residual risks, robust safeguards in place

Where participants expressed disagreement or uncertainty was raised about a proposed activity, the issue was treated as a gap.

Stakeholder-derived insights are distilled in Table 4.1, embedding community voices, sector- expert feedback, and institutional self-assessments in the ESMP's management logic. Thus, ratings below are calibrated against the lived experience of frontline stakeholders across all six geopolitical zones in Nigeria (see ESMF State Filled checklist document for feedback from stakeholder engagement exercise).

Table: 4.1 Summary Risk Profile Table based on Stakeholder Engagement and Consultations

#	Intervention	Key Stakeholder-identified Risk Drivers	Critical Management Gaps	Indicative Risk Category*	Follow-up Action
1	Construction of 1 warehouse and 6 regional laboratories / upgrade state public-health laboratories	Customary-land disputes; biomedical & chemical waste; flood exposure	Ancillary-staff OHS; functional GRM absent in some states	Substantial	Implementation of the Environmental and Social Management Plan for the new construction; implementation of the Environmental and Social Code of Practice for the upgrade and expansion works; laboratory-specific Waste- Management Plan (WMP); full GRM roll-out

#	Intervention	Key Stakeholder-identified Risk Drivers	Critical Management Gaps	Indicative Risk Category*	Follow-up Action
2	Build / expand warehouses & offices	Siting conflicts; construction waste; high utility demand	Patchy energy / water-efficiency plans; GRM inconsistency	Moderate	Site-specific ESMP; incorporate resource- efficiency design
3	Mobile laboratories for remote surveillance	Road-safety hazards; spill response; corridor insecurity	Contingency drills; psychosocial-support plan; GRM gaps	Moderate → Substantial (context-driven)	Mobile-Lab Bio-risk & Security Plan; fatigue- management protocol
4	Flood-protection, WASH & emergency works	Altered hydrology; inequitable service access	Climate-resilient design is missing in some states	Moderate → Substantial	Hydrological modelling; resilience- design checklist
5	Veterinary points of entry (PoE)	Habitat disturbance; disinfectant run- off; informal-trade disruption	Cross-border emergency plan; GRM gaps	Moderate → Substantial	Joint border-health ESMP; livelihood- impact mitigation
6	Third-party logistics (3PL) for specimen referral	Corridor insecurity; spill risk; regional service inequality	Contract-compliance monitoring; GRM gaps	Moderate	3PL E&S clauses; corridor risk assessment
7	Sample- collection & transport materials	Single-use plastics; chemical-preservative hazards	End-of-life plan; inventory resilience; GRM gaps	Moderate	National disposable- materials WMP; procurement-system upgrade
8	Expanded sample-transport network & reagents	Fuel emissions; reagent disposal; supply inequity	Inventory & workforce deficits; GRM absence (some states)	Moderate	Logistics climate- footprint plan; staff capacity-building

**Final categorization to be confirmed during activity specific ESMP preparation.

For HeSP, the NPCU will reference the activity numbers in Table 4.1 when drafting site- specific ESMP matrices. This practice secures traceability from stakeholder concern to risk profile to mitigation measures to monitoring indicator, ensuring compliance and an auditable safeguard trail.

4.6 Management of Stakeholder Participation and Expectations

Management of stakeholder participation is crucial to participation, significance, and outcome of the goal of such engagement. Project implementers in HeSP will ensure that ethical factors, cultural influences, political dynamics, and sentiments as well as vulnerability and gender factors are considered in addition to the technical terms. In many cases, engaging with affinity groups rather than community wide engagement may be more effective and significant. Power dynamics and cultural norms of a local context can affect stakeholders' participation. Resolving these issues requires choosing appropriate consultation channels and environment conducive for each targeted segment of the population.

Engaging with minority or sensitive groups such as contacts of exposed persons, internally displaced persons and the disabled may require conducting focused group discussions to ensure that the people are engaged in a manner that will encourage freedom of information and support. Also, the project team should ensure that each consultation adds value and shows a milestone in addressing previous concerns and expectations raised by stakeholders. Project teams must also be considered as incessant consultations especially where expectations are

not met or where project preparation process is perceived as taking lengthy time may deter interest.

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

- Conduct adequate awareness, sensitization, and consultation on the scope, identified risks and impacts of the project and its intended results through means identified in table 4.1
- Engagement events should occur in line with the SEP schedule so that there is a clear linkage between engagement activities and the project stages
- Locate meetings at locations/venues that are not far from where participants reside, or at least be responsible for logistics and mobilization of participants
- Engender transparency through information disclosure as contained in section 4.9 of this SEP
- Ensure that engagement is accessible and managed so that it is culturally appropriate
- Ensure adequate and timely information and opportunities are provided to all stakeholders to facilitate their involvement
- Ensure that minority groups and vulnerable groups are consulted separately using culturally appropriate language and medium of communication
- Ensure that engagement is devoid of elite's hijack

4.7 Proposed Strategy for Consultation and Feedback

Community Entry

This is a process of initiating, establishing, and nurturing a relationship with the community with the purpose of securing and sustaining the community's interest, gaining support from the community leaders and ensuring establishment of good working relationship and sustainability of the project. This exercise will be carried out by the Social Safeguard Specialist on the NPCU and supported by the risk communications and community engagement officers and community-based officials (Disease Surveillance and Notification Officers, Community Health Workers) where available.

Activities involved include:

1. Obtain authorization to enter community from the State Government/ Local Government Ministry/ Authority
2. Visitation to Traditional/religious leaders to intimate them on the project and project objectives. This visitation includes key in-depth interviews and one-on-one meetings with local leaders or small group meetings with different leadership segments. It is important to note that the best practice is to communicate with the local leadership first before going to the community. These personal forms of communication set the tone for the project.
3. Community members, Affinity Groups, Marginalized groups: Meeting with community members to inform them about the project and to solicit their views on the project through the process listed in Table 4.3 below.
4. Communication and Feedback: Establish a clear communication line of feedback and grievances with the host communities through direct access channels that creates a sense of protection and confidentiality. It is important to note that the HeSP through dialogue mechanism and feedback obtain useful information from the beneficiaries and affected communities due to project activities for a range of issues including security, unethical conducts of contractor or project personnel, perception of minority groups, etc. This information when available can help the NPCU and other implementers redesign their procedure and actions in order to forestall deviations and compromises

that can derail the project. In the light of this, the national and subnational implementing entities will expand their information collection channels to include the following:

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



4.8 Consultation Methods

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

Table 4.2 Consultation Methods

Consultation Methods	Targeted Stakeholders
Public Consultations	Every Stakeholder inclusive of all groups and gender
Focus group discussions (FGDs); Female facilitators for women-led groups Use of pictorial materials for low-literacy groups.	Health affinity groups, youth group, disabled, MDAs, Traditional/ Faith based Leaders, minority groups.
Face to face meetings and workshops	Government Ministries and Departments, NGOs, Traditional rulers,
Correspondences (Radio Jingles, Phone, Emails) Town hall meetings	Every Stakeholder
Religious meetings, town hall meetings, village meetings	Community members and farmers, Herders etc.
Project Website	Every Stakeholder with internet access

Advocacy and sensitization using IEC materials including banners, signposts, and flyers	Every Stakeholder
Virtual meetings	MDAs (Formal Stakeholders)

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

Table 4.3 Stakeholder Engagement Action Plan

Project Preparation	Primary Engagement Activities and Topics	Target Stakeholders	Engagement Technique/ Platform of Contact	Frequency and Location	Responsibility
Project Preparation	1.Preparation and disclosure of all Environmental and Social Instruments – ESMP, Labour Management Procedure, Stakeholder Engagement Plan, Environmental and Social Commitment Plan	All stakeholders	All documents will be published on the Ministry of Health and Ministry of Environment websites	June 2025	NPCU
Project preparation	A designated and manned telephone line will be set up at the NPCU and SPCU that can be used by the public to make complaints and grievances, obtain information, make enquiries, or provide feedback on the Project.	Project affected persons, and any other stakeholders and interested parties	Dedicated hotline Ministry of Health – Federal and State	Throughout Project implementation	NPCU/SPCU
Project Identification	Advance announcement of commencement of major project activities, grievance Redress Mechanism, advertisement for levels	Local community within the project areas, County Authority	Community townhall	January 2026	Environmental Health Officer
Project Implementation	Convey general information on the project, detail discussion on sub project activities,	Project affected community, Hospitals, Health	Town hall meeting	Throughout the duration of the Project	Environmental Health Officer

	<p>project environmental and social risk and mitigation measures, provide update on implementation progress to local, regional and national stakeholders.</p> <p>Present project information to the group of stakeholders</p> <ul style="list-style-type: none"> • Allow the group of stakeholders to provide their views and opinions • Use participatory exercises to facilitate group discussions, brainstorm issues, analyze information, and develop recommendations and strategies <p>Recording of responses</p>	Facilities, laboratories, Vulnerable individuals, Community, Farmers, Livestock Traders, Port Officers, Veterinary officers			
During Implementation	<p>Distribution of project information to government agencies, organizations and Institutions of research.</p> <p>Invite stakeholders to meetings</p>	Government officials, NGOs, Development partners, County, Port of Entry, Health Facility	Correspondence by email, phone, written communication	Throughout Project implementation	NPCU/SPCU
During Implementation	Share information on timing of location, clearance, potential impacts and proposed mitigation measures.	Vulnerable individuals, Community, Farmers, Hunters Livestock Traders	Direct communication with affected Health facilities for the rehabilitation works and new construction	Throughout Project implementation	NPCU/SPCU
Project Completion	Will be used to solicit views and opinions on project impacts and solutions	Vulnerable individuals, Community, beneficiaries	Interviews	During project implementation in the counties at end of the project	Project implementation Team

4.9 Proposed Strategy to Incorporate the Views of Vulnerable Groups

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

Table 4.4 Method of consultation of vulnerable persons

Category of Vulnerable Person	Method of Consultation and Consideration
Elderly people above the age of 65	Recognize their organization and leadership, Focus Group meetings, Assisted transport to meetings
People living in hotspots of endemic epidemic prone diseases	Recognize and respect cultural norms. Additional separate Focus Group meetings should be held for contacts in infected persons. Where women are in seclusion, female consultants and specialists may be assigned to consult with them in the designated areas.
Orphans	Additional Focus Group Meetings Assisted Transport to meetings
People living with disabilities	Recognize their organization and leadership, Focus Group meetings, Assisted transport to meetings
People living in extreme poverty	Assisted transport to meetings
IDPs	Assisted transport to meetings Additional Focus Group meetings

4.10 Proposed Strategy for Information Disclosure

The objective of the information disclosure plan is to ensure that appropriate project information, particularly activities on environmental and social risks and impacts are disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner that conforms to national laws (EIA ACT) and World Bank standards. This SEP makes provision for disclosure of safeguard documents to project-affected and other interested stakeholders mapped during stakeholder's identification exercise. The disclosed documents which shall be in English language will be released for public review for the period of 21 days in accordance with Nigerian Regulatory Frameworks. Distribution of the disclosure materials will be done by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access as follows:

- Ministry of Finance
- Ministry of Health
- Ministry of Environment
- Ministry of Livestock Development
- Ministry of Agriculture
- Ministry of Water Resources & Sanitation,
- Ministry of Local Government Affairs,
- Ministry of Aviation
- Ministry of Transportation
- Ministry of Works
- Project Management offices

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

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

Table 4.5 Information Disclosure Strategy

Stakeholders	Project Information Shared	Means of communication/ disclosure
MDAs	<ul style="list-style-type: none"> • Safeguard Documents • Regular updates on Project development; including proposed design / livelihood enhancement and support programmes /community empowerment program • Additional types of Project's information if required for the purposes of regulation and permitting. 	<ul style="list-style-type: none"> • Dissemination of hard copies • Project status reports • Meetings and round tables. • Virtual Meeting online, webinar • Project website

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

4.10.1 Timelines

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

Table 4.6 Disclosure Timeline

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

4.10.2 Feedback

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

- The HeSP website for information disclosure will be equipped with an online feedback feature that will enable readers to leave their comments in relation to the disclosed materials. This will allow stakeholders with access to internet to view information about the project and to initiate their involvement in the public consultation process. (Please refer to Strategy

on Information Disclosure)

- Feedback will also be received using the email address of the NPCU and SPCUs
- The stakeholders will also make use of the free toll lines that will be made available by the NPCU to communicate concerns and feedback.

4.11 Future Phases of Project

This HeSP SEP will be domesticated by the participating States and updated by the SPCUs to ensure effectiveness of SEP implementation in their respective states.

4.12 Capacity Building and Training for Stakeholder Engagement

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

Table 4.7 Capacity Building Plan

S/N	Capacity	Target Group(s)	Timeline
1	SEP Implementation capacity	NPCU, FMOH, FMOLD, FMOE, SPCUs, Community based officials, and Interest groups	one during project preparatory phase and another during implementation phase and any other time as may be need induced
2	Facilitation of stakeholder engagement	NPCU, FMOH, FMOLD, FMOE, SPCUs, Community based officials, and Interest groups	one during project preparatory phase and another during implementation phase and any other time as may be need induced
3	Community-focused awareness creation on Citizens Engagement and Social Accountability	NPCU, FMOH, FMOLD, FMOE, SPCUs, Community based officials, and Interest groups	one during project preparatory phase and another during implementation phase and any other time as may be need induced
4	Monitoring of implementation	NPCU, FMOH, FMOLD, FMOE, SPCUs, Community based officials, and Interest groups	one during project preparatory phase and another during implementation phase and any other time as may be need induced
5	Stakeholder engagement data management	HeSP Safeguards Team, M&E and MIS Team	one during project preparatory phase and another during implementation phase and any other time as may be need induced
6	Management of Grievance during SEP	HeSP Safeguards Team	one during project preparatory phase and another during implementation phase and any other time as may be need induced

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

5.1 Overview

The implementation of this SEP would require a multi- sector operation with lead coordination role resting upon the NCDC. The NCDC shall have the overall responsibility of project implementation through the NPCU that provides technical safeguard support to SPCUs.

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

Table 5.1: Responsible Institutions for SEP and their Roles

Category	Roles & Responsibilities
National Project Coordinating Unit (NPCU) National Program Coordinator, Environmental and Social Safeguard Specialists	<ul style="list-style-type: none"> Preparation and implementation of project activities that meet the requirements of the World Bank Responsible for providing technical support to the SPCUs and setting up safeguard and communication units that will have the overall responsibility of providing technical assistance to the SPCUs such as review of TOR, ESMP and RAP reports and implementation of this RPF. Approves payments Ensuring that State agencies adhere to the ESS5 guideline of the Bank
State Project Coordinating Units (SPCUs)	<ul style="list-style-type: none"> Responsible for coordination of implemented State activities Sets up grievance redress committees responsible for funding of SEP, GBV/ SEA, GRM, M&E activities and capacity building Liaises with NPCU, WB, and other State governments
Federal/State Government MDAs: Ministry of Health, Environment, Livestock Development	<ul style="list-style-type: none"> Provide Policy Guidance, Ministerial Coordination, and Institutional Changes regarding Environmental & Social issues of the project through the steering committee Ensure that the disclosure policy of the government of Nigeria is adhered to by the project.
SPCU Safeguards Unit; Environmental health officer	<ul style="list-style-type: none"> Prepare compliance reports with statutory requirements. Review and approve the Contractor's Implementation Plan for the environment Liaise with various Central and State Government agencies on environmental, resettlement and other regulatory matters;
NGOs/CSOs/Contractors	<ul style="list-style-type: none"> Assisting in their respective ways to ensure effective response actions, conducting scientific research alongside government groups to evolve and devise sustainable environmental strategies and livelihood restoration measures. Organizing, coordinating, and ensuring safe use of people in a response action, and identifying where people can best render services effectively Providing wide support assistance helpful in management planning, institutional/governance issues and other related matter, project impact and mitigation measure, awareness campaigns
Grievance Redress Committee	<ul style="list-style-type: none"> Responsible for receiving, registration, verification and processing of grievances and complaints related to the project, including giving feedback to aggrieved persons and the project management

5.2 Funding Responsibility and Cost

The funding responsibility of SEP activities is within the jurisdiction of the NCDC at the federal level through the NPCU. At the state level, it is the responsibility of the SPCU to fund SEP, RAP and ESMP preparation and implementation through the state fund for the project. Stakeholder engagement is estimated at USD350,000 over 4 years, covered by Component 4 of HeSP budget.

5.3 Cost of Funding SEP Implementation

A deterministic approach was adopted for arriving at indicative cost description for State SEPs implementation in HeSP. Cost items, and breakdown will be finalized by the NPCU using the cost descriptions in the template in annex 1 of this SEP.

5.4 Implementation for SEP Activities

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

Table 5.2: SEP Activities Responsible Party

NO	ACTIVITY	RESPONSIBLE PARTY
1	Liaising with World Bank/Project Supporters	NPCU
2	Coordination of Activities	NPCU
3	Preparation and Disclosure of SEP	NPCU/World Bank
4	Selection of Sub-Projects	NPCU, Communities, NGOs/CBOs, Contractors, World Bank
5	Selection of sub-project sites	NPCU/Relevant MDAs
6	Social Impact studies (conduct social impact assessment and property impact studies)	NPCU
7	Identify vulnerable people when developing instruments	NPCU
9	Marking of affected properties, Inventory of affected properties, Notifications, Request for proof of eligibility, - Consultations	NPCU, community/ LGA officials
10	Valuation of Affected Properties	Ministry of Physical Planning and Urban Development, NPCU
11	Organize and implement census of affected people and census and valuation of affected assets in the framework of the development of ARAP or ARAP	NPCU through Resettlement Consultant
12	Consultations, planning and Preparation of RAP	NPCU/Consultants
13	Review of RAPs	NPCU and World Bank
14	Disclosure of RAP	NPCU/World Bank
15	Internal Monitoring	NPCU
16	External Monitoring and Approval	FMOH, FMOLD, FMOE, SMOE, NGOs/CBOs, host Communities, World Bank

17	Preparation of Monitoring and Evaluation Report of RAP and Disclosure	NPCU
18	Disclosure of values. Making of offers Processing for payments	NPCU/ Ministry of Finance
19	Release of funds for payment	Ministry of Finance, NPCU
20	Grievance and dispute resolutions	Grievance Committee (NPCU/Ministry of Justice, NCDC, MOH)
21	Representing government for any law court redress cases	NPCU, State Attorney General's Office, NCDC, MOH
9	Marking of affected properties, Inventory of affected properties, Notifications, Request for proof of eligibility, - Consultations	NPCU, community/ LGA officials

CHAPTER 6: BENEFICIARY FEEDBACK GRIEVANCE REDRESS MECHANISM (BFGRM)

6.1 Introduction

The Beneficiary Feedback Grievance Redress Mechanism (BFGRM) is an alternative dispute resolution arrangement, outside the judicial system by aggrieved parties for redress. The BFGRM is a much faster approach to dispute resolution when compared to the judicial system which may take longer periods, and many times are accompanied by injunctions which adversely affect project implementation. The HeSP will develop a functional BFGRM system, guided by an approved BFGRM manual. The project BFGRM will be operationalized in each participating State to handle all project related disputes arising within the boundaries of the project activities. The establishment of the project BFGRM in each participating State is a proactive measure for addressing and resolving complaints out of court.

The HeSP BFGRM will be developed on an IT based system (Project Management Information Systems (PMIS)) to manage the entire BFGRM system. Monthly/quarterly reports in the form of a summary of complaints, types, actions taken, and progress made in terms of resolving pending issues will be submitted for review to all focal points at different levels.

Once all possible avenues of redress have been proposed and if the complainant is still not satisfied then s/he will be advised of their right to escalate to the next level or take legal recourse.

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

- Category 1- Wrongful Inclusion and Exclusion
- Category 2- Payments
- Category 3- Service delivery (including quarantine, facility- and community-based service delivery)
- Category 4- Fraud and Corruption issues
- Category 5 – Inquires/information requests
- Category 6 – Gender Based Violence
- Category 7 – Others

The HeSP will establish a procedure to receive and resolve any queries as well as address complaints and grievances about any irregularities through the BFGRM. The BFGRM will also handle complaints and grievances related to resettlement and other social and environmental issues if necessary. Grievance redress committees (GRC) will be formed at each Project level to receive and resolve complaints as well as grievances from aggrieved persons from the local stakeholders, including the project-affected persons. Based on consensus, the procedure will help to resolve issues/ conflicts amicably and quickly, saving the aggrieved persons from having to resort to expensive, time-consuming legal actions. The procedure will, however, not pre-empt a person's right to go to the courts of law.

6.2 Objectives of BFGRM

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

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

6.3 Importance of HeSP BFGRM

The establishment of a BFGRM is beneficial for organizational and project strengthening. Grievances should be seen as a gift and not a threat to the project. Grievances or feedback submitted are a source of valuable information that can help to strengthen the implementation of the project and provide support and protection to project beneficiaries. The project's ability to resolve grievances demonstrates transparency and accountability to beneficiaries and non-beneficiaries. GBV complaints will confidentially refer to trained professionals, separate from regular GRM flow.

Who can raise grievances?

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

Structure for managing grievances and staff responsible

The following can receive grievances from complainants under the HeSP BFGRM:

1. Grievance volunteers and community health/environment officials (at the community level)
2. Disease Surveillance and Notification Officers (DSNO), Animal, and Environmental health field supervisors (at the LGA level)
3. SPCU GRM Focal Points/GRC Members - specifically the Social Safeguards and Environmental Safeguards Specialists and Advisers (at State the level)
4. NPCU GRM Focal Points – specifically the Social Safeguards and Environmental Safeguards Anchors and Advisers (at Federal the level)

6.4 BFGRM Procedure

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

1. Grievance volunteers and Community Health/Environment Officials: Members of the communities can channel their complaints to grievance volunteers or community health/environment officials closest to them. The volunteers or officials will liaise with the next level officials at the LGA level to address complaints.
2. Disease Surveillance and Notification Officers, Animal, and Environmental Health Field Supervisors: Complaints can be made through DSNOs or Animal/Environmental Health Supervisors in person or in writing. They are also responsible for reviewing any complaints

- relating to their LGA received via any channel. They are effectively trained on project activities to collate and address grievances, channeling them as necessary to the SPCU GRM FPs.
3. SPCU GRM FP/ State GRC Members: Grievances can be made at the state offices either in person, via telephone, in writing, or through any other accessible channel as there are SPCU GRM FPs that have been trained on effectively handling and managing grievances. Telephone numbers for State hotlines will be displayed at various state and local government offices and in project communities.
 4. NPCU GRM FPs: At the NPCU level, there are GRM FPs who have been trained on handling and managing grievances and they can receive and register grievances from beneficiaries and non-beneficiaries using any channel convenient for them. Grievances may come in via hotline, in writing, in person, or via social media.

Table 6.1 Categories of Grievances Under HeSP and timeline for response

CATEGORIES	CATEGORIES OF GRIEVANCES UNDER HeSP PROJECTS	RESPONSIBILITIES	RESPONSE TIME FOR FURTHER ACTION
CATEGORY 1	WRONGFUL INCLUSION/ EXCLUSION <ul style="list-style-type: none"> Wrongful inclusion Wrongful exclusion 	NPCU/SPCU/MOH/ MOE/MOLD	1- 14 days
CATEGORY 2	PAYMENTS <ul style="list-style-type: none"> Delay in payment Incorrect payment amount 	All payment	Within 7 days
CATEGORY 3	SERVICE DELIVERY ISSUES Service delivery (including quarantine, facility- and community-based service delivery) <ul style="list-style-type: none"> Mistreatment Rudeness by staff Complaints not responded to Wrong information/poor communication Other Service Delivery Issues 	State- or Federal-level GRM FPs, SPCU, NPCU Coordinators	Within 7 days
CATEGORY 4	FRAUD AND CORRUPTION ISSUES <ul style="list-style-type: none"> Bribe and Extortion Misappropriation/Theft 	SPCU/FPCU GRM FPs, SPCU Coordinator, NPC	21 days or more
CATEGORY 5	INQUIRIES AND INFORMATION REQUESTS	All GRM FPs	Within 7 days

CATEGORY 6	GENDER-BASED VIOLENCE <ul style="list-style-type: none"> Sexual exploitation and abuse (SEA) or sexual harassment (SH) (e.g., staff or contractor inflicting SEA/SH on a beneficiary, community member, or other staff members) 	LGA/SPCU GRM FPs, Gender/GBV Anchors and Advisers are responsible for ensuring GBV-related complaints are treated according to the HeSP GBV Accountability Response Framework The survivor/complainant maintains the right to choose whether further action should be taken on their complaint. They also have the right to change their mind and stop seeking resolutions of their complaint.	As soon as the incident becomes known refer using the referral directory. If the perpetrator is associated with the project and the survivor wants to proceed with the case the GRM FP should notify the SPCU GRM FP/ SPCU Coordinator/NPCU Coordinator
CATEGORY 7	OTHERS		

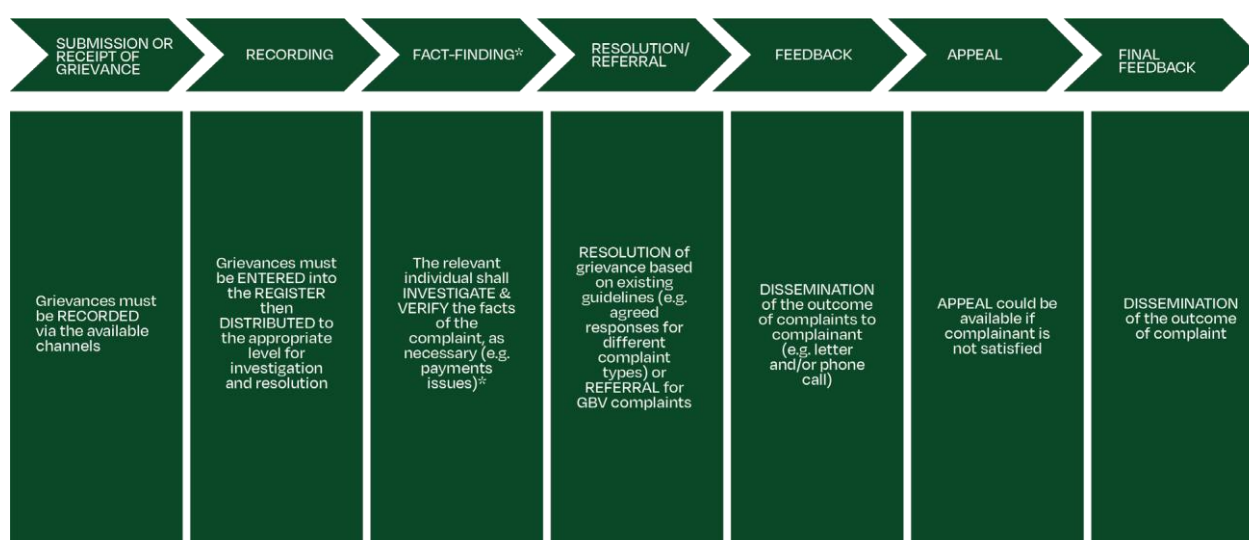


Figure 6.1 GRM Procedures

6.5 Addressing complaints related to GBV and SEA/SH

The HeSP BFGRM takes complaints related to GBV and sexual exploitation or abuse/sexual harassment seriously. However, regarding any complaint that is reported to the GRM (including complaints involving other forms of GBV that are not related to the project), the GRM will also have procedures in place to refer the individual to GBV service providers. If not satisfied, grievances can be submitted to: www.worldbank.org/grievances

6.5.1 BASIC PROCESSES IN GRIEVANCE HANDLING

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

A. Service Standards for HeSP BFGRM

- HeSP will ensure that all grievances are handled and resolved within the specified time frame

depending on the category of complaint. The maximum time frame for resolving categories of issues that are within the remit of HeSP will be 3 months (90 days).

- HeSP will ensure that feedback is provided to complainants on the status of their grievances within 28 working days from the time the complaint was first received.
- Where investigations are likely to take more than 7 days, HeSP will provide complainants with a progress update.
- HeSP will guarantee that all complainants are treated with respect and fairness.
- HeSP will ensure that persons with disabilities and other vulnerable groups can easily access the BFGRM using available channels for registering complaints.
- HeSP will ensure that GBV and SEA/SH complaints are treated appropriately following a survivor-centered approach

B. Guiding Principles

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

I. Communicated and Visible

A good grievance mechanism should be clearly communicated to all relevant stakeholders (beneficiaries, the public, and others). Information on how to channel grievances should be clear and widely publicized. Beneficiaries and non-beneficiaries should be informed on the timelines and the necessary steps that will be taken to handle their grievances. Information on what type of grievances can be made should also be clearly communicated to the beneficiaries, staff, and any other interested party. In the case of HeSP the community health workers, DSNOs, Environment, and Animal health officers are the frontline staff who engage directly with citizens hence should be well knowledgeable on how the BFGRM operates.

II. Accessible

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

III. Responsive

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

sexual exploitation and abuse/sexual harassment (SEA/SH) complaints.

IV. Fair and Objective

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

6.6 Expectation When Grievances Arise

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

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

6.7 Grievance Redress Process

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

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

a. Registration

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

b. Verification

The verification determines among other things whether the matter has a relationship with the project activities, and whether the matter can be handled/resolved at the level where it is presented. This will determine whether the matter should be referred to the next level or not. Part of the investigations may also be to assess the cost of lost, or risk involved in the grievance.

c. Processing

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

d. Feedback

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

The NPCU and SPCU will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by the Bank and any other interested persons/entities. The SPCU will also prepare periodic reports on the grievance resolution process and publish these on the HeSP website. The HeSP intends to strengthen the BFGRM through information and communication technology to ensure that all complaints including those of sexual exploitation and abuse are immediately reported to the Government.

HeSP will integrate the BFGRM on a web-based dashboard, to adequately and promptly address any potential grievance related to Gender Based Violence and SEA. The complaints registered in this system will be managed by a dedicated administrator that will liaise immediately with any GBV and SEA complaints with the contractors, consultants and SPCU for immediate measures. If the BFGRM receives a case on sexual exploitation and abuse related to the project, it will be recorded, and the complainant will be referred to the relevant assistance, if needed, for referral to any other service providers. The supervision consultant will keep the information confidential to protect the privacy of GBV and SEA complainants. In cases, where the perpetrator(s) is linked to project activities then the contractor will take appropriate actions as per the Code of Conduct signed by the person and under the effective law in Nigeria. HeSP will report the activities and outcomes of GBV and SEA surveillance and management to the World Bank on a regular basis.

6.8 Financing of the Grievance Redress Mechanism and Cost of Remediation

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

Table 6.2: Implementation Plan for Grievance Mechanism

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

6.9 World Bank Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by Sub-project interventions may submit complaints to existing project-level BFGRM or the WB Grievance Redress Service (GRS). Project affected communities and individuals may also submit their complaint to the World Bank's independent Inspection Panel, which determines whether harm occurred, or could occur, because of non-compliance with WB safeguards policies and procedures. Details of the procedures to submit complaints to the WB's corporate GRS, is available in the GRS website: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

For information on how to submit complaints to the WB Inspection Panel, please visit www.inspectionpanel.org.

Any disclosure instrument on GRM will provide addresses of the GRS and the Inspection Panel

CHAPTER 7: MONITORING AND REPORTING

7.1 Monitoring

It is important to monitor the ongoing stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and that stakeholders have been meaningfully consulted throughout the process. The SEP will be periodically revised and updated as necessary during project implementation to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project-related activities and to its schedule will be duly reflected in the SEP. The two keyways in which the stakeholder engagement process will be monitored are through the review of Engagement activities in the field and through reporting engagement activities.

7.2 Review of Engagement Activities in the Field

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

Table 7.1: Key Performance Indicators by Project phase

Project Phase	Key activities	Indicator
Preparatory & Planning phase for construction	Preliminary Stakeholder engagement on project designs and anticipated impacts including ESMF, LMP, ESMP, RAP . Notification on multi-media (posters, radio, TV Official correspondence	Stakeholder engagement reports & records of meetings Number of notifications & mode of communication Number of letters/emails sent, number of meetings conducted, number of site-level consultations made, number of vulnerable groups consulted etc.
Project Implementation	Project Notices issued	Newspaper clippings
	Recorded Grievances in the GRM	All grievances addressed as per grievance procedure Pending grievances & suggested resolutions. These will be kept in a ledger which will also take entries of time taken to resolve grievances
	SEP Implementation Public gatherings	Stakeholder engagement meeting reports Number of public gatherings & records (topics discussed)
	Official correspondence	Number of letters/emails sent
Project Completion	SEP implementation Project	SEP final report

7.3 Reporting Stakeholder Engagement Activities

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

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

- Materials disseminated: types, frequency, and location
- Place and time of formal engagement events and level of participation including specific stakeholder groups (e.g., elderly, youth, community leaders, contacts of exposed person)
- Number of comments received on specific issues, type of stakeholder and details of feedback provided.
- Numbers and types of stakeholders who encounter the project team by mail, telephone, and any other means of communication
- Meeting minutes, attendance registers and photographic evidence
- Comments received by government authorities, community leaders, and other parties and passed to the project
- Numbers and types of feedback and/or grievances and the nature and timing of their resolution. % grievances resolved within 30 days; consultations held per quarter.
- The extent to which feedback and comments have been addressed have led to corrective actions being implemented.
- Monthly summaries and internal reports on the implementation of the SEP and BFGRM, together with the status of implementation of associated corrective/preventative actions will be systematized by the NPCU Social Safeguards Specialist and reported to the National/State project coordinators. The monthly summaries will provide a timely mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner and adjust its operations or approach as necessary.

Table 7.2: Format for Recording Engagement Activities

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

7.4 SEP Budget

The implementation of the Health Security and Resilience in West and Central Africa project is estimated to be in the amount of 18M from the day of project ratification. An estimated amount of USD350,000 will be required for SEP implementation and GRM operating costs, which is directly in line with project implementation.

Table 7.3 Tentative budget for SEP implementation

Project Stage/Activities	Responsible	Duration per Year	Estimated projected cost
Project Design level			
Draft of SEP, Draft of ESCP, Update of HCWM	NCDC NPCU	One-off	USD70,000

Implementation			
Field Visit (fuel, communication Card, DSA) per quarter.	Environmental and Social Officers NPCU MOH		USD180,000
Community discussion, town hall meetings, workshops	NCDC NPCU		USD30,000
Disclosure of SEP, ESCP, ESMF and LMP	NCDC NPCU	One-off	
GRM Implementation (throughout the duration of the project)	NCDC NPCU, SPCU		USD70,000
Total budget			

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Template for ESS10: Stakeholder Engagement and Information Disclosure Stakeholder Engagement Plan and Stakeholder Engagement Framework. Available from <<http://pubdocs.worldbank.org/en/909361530209278896/ESF-Template-ESS10-SEP-June-2018.pdf>> [Accessed on 13 March 2019]

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Federal Government of Nigeria (1999), Constitution of the Federal Government of Nigeria

Freedom of Information Act (2011), Federal Government of Nigeria

Stakeholder Engagement Plan for HOPE-PHC (2024), Federal Ministry of Health

APPENDIXES

Annex 1

Breakdown of SEP Implementation Budget

Cost Item	Unit	Unit cost	No of Participants	Amount
SEP awareness and sensitivity campaign: Production of jingles, IEC materials such as banners, T- shirts, caps, fliers, newsletters, signages	Lumpsum		To be determined	
Meetings with MDAs, development partners, beneficiaries	Lumpsum	2 meetings per month x 3months	To be determined	
		Quarterly meeting (4 times a year)		
Public address system, Photo Camera, Video camera, Projector	Per unit	Public Address system Photo Camera Projector Digital video camera		-
Website and server	lumpsum			
Vehicle maintenance and fueling	Per purchase time			
GRM and GBV/SEA operational expenses	lumpsum			-
TOTAL				

Annex 2

Minutes of Stakeholders' Engagement Meeting on the Nigeria Health Security Program (HeSP)

Date: Wednesday, 7th May 2025

Time: 10:00 AM

Venue: PHEOC, Enugu State (Hybrid Format)

Facilitator: Consultant

Host: Nigeria Centre for Disease Control (NCDC)

1. Attendance

The engagement brought together diverse stakeholders from key sectors in Enugu State, including:

- State Ministry of Health
- Ministry of Environment and Climate Change
- Ministry of Agriculture and Veterinary Services
- Enugu State Primary Healthcare Development Agency
- Enugu State Waste Management Authority
- Women's and youth groups
- Traditional and community leaders
- Academia (College of Medicine, UNN)
- Civil society organizations

Participants joined both physically at the State's Public Health Emergency Operations Centre and virtually via an online platform. A detailed attendance list is annexed.

2. Welcome Address

The session was officially opened by the host, Program Lead from the Nigeria Centre for Disease Control (NCDC), who welcomed participants and emphasized the critical importance of stakeholder inclusion in environmental and social safeguards planning for the Health Security Program. He reiterated that the program's success hinges on early identification of risks and proactive mitigation, informed by those closest to the ground.

3. Meeting Objectives

The Consultant Facilitator, provided the objectives of the engagement:

- To inform stakeholders about the scope, objectives, and activities under the Health Security Program (HeSP)
- To gather stakeholder perspectives on potential environmental and social risks arising from implementation
- To collaboratively complete a standard Environmental & Social Safeguards Checklist
- To ensure findings feed directly into the national Environmental and Social Management Plan (ESMP)

4. Presentation on the Health Security Program (HeSP)

A comprehensive presentation by the Program Lead introduced the Health Security Program's core interventions:

- Public health laboratory upgrades
- Expansion of health infrastructure (warehouses, offices)
- Mobile labs and emergency response capacity
- Veterinary points of entry and waste management systems
- Specimen referral networks and logistics support
- Wildlife surveillance and One Health interventions

The presentation underscored the need to align these interventions with international standards such as the World Bank's Environmental and Social Framework (ESF).

5. Stakeholder Risk Mapping and Checklist Completion

The engagement was structured around an official risk-screening checklist, completed collaboratively by stakeholder groups. The checklist assessed the likelihood and severity of:

- Community health and safety risks
- Occupational health and safety for workers
- Waste management challenges
- Environmental degradation (air, water, land)
- Gender, equity, and inclusion concerns
- Institutional gaps in capacity and grievance redress

Stakeholders were guided through the checklist and supported in documenting their inputs. All completed copies were collected for analysis.

6. Key Issues Raised by Stakeholders (Enugu-Specific Highlights)

Enugu stakeholders offered rich and contextually grounded insights, including:

- **Waste Management Deficiencies:** Concerns were raised about the state's capacity to manage biomedical and chemical waste from laboratories, veterinary services, and mobile teams.
- **Occupational Safety Gaps:** Health and laboratory workers reported exposure to psychosocial stress and lack of tailored occupational health and safety (OHS) protocols.
- **Community Safety:** Risks related to mobile lab movements and emergency response deployments were noted, including spill hazards and road safety concerns.
- **Land Disputes and Siting Conflicts:** Potential for disputes in siting new infrastructure on customary lands was flagged, emphasizing the need for proper stakeholder consent.
- **Equity and Access:** Stakeholders voiced that rural and vulnerable populations (women, youth, PWDs) risk being left behind if HeSP assets are not equitably distributed.
- **Grievance Redress Gaps:** Many institutions lack functional grievance redress mechanisms (GRMs) to handle complaints or community feedback.
- **Climate Risks:** Concerns over flood exposure for laboratories and emergency infrastructure were also discussed, especially given Enugu's rainy-season vulnerability.

7. Integration with National Risk Profiles

Insights from the Enugu engagement aligned closely with national patterns observed in other states (see Section 4.4 of ESMP framework), particularly around:

- Substantial risks in waste management, laboratory safety, and land acquisition
- Moderate to substantial risks in emergency logistics, community conflict, and equity
- Institutional weaknesses in GRMs and environmental monitoring systems

8. Agreed Follow-up Actions

Stakeholders endorsed the following recommendations:

- Immediate Risk Integration: The state-level checklist will be included in national safeguards planning for HeSP.
- Safeguard Instruments: Enugu-specific ESIA/ESMP and waste-management plans to be developed for all infrastructure projects.
- Capacity Building: Training for frontline health workers on OHS, environmental safeguards, and risk communication.
- Strengthening GRMs: Develop mobile- and community-based channels to allow grievances to be reported and addressed.
- Equity Monitoring: Institute yearly audits to track inclusion of marginalized groups in access to program benefits.

9. Closing Remarks

The meeting ended with closing remarks from the host and facilitator, reiterated NCDC's commitment to safeguard compliance and thanked Enugu State for its proactive engagement. Dr. Charles Umar emphasized that stakeholder insights are not merely consultative but form the backbone of implementation, risk mitigation, and accountability systems under HeSP.

Prepared by:

Dr. Charles Umar

Consultant Facilitator

Stakeholder Engagement – Health Security Program

Note: This minute was prepared by the meeting facilitator in line with the engagement's documentation mandate, ensuring an objective and technically accurate reflection of stakeholder inputs.

Date: 22nd May 2025

Signatures:

Program Lead, NCDC

Consultant Facilitator

Annex 3

Minutes of Stakeholders' Engagement Meeting on the Nigeria Health Security Program (HeSP)

Date: Monday, 12th May 2025

Time: 10:00 AM

Venue: PHEOC, Asaba, Delta State (Hybrid Format)

Facilitator: Consultant

Host: Nigeria Centre for Disease Control (NCDC)

1. Attendance

The stakeholder engagement convened a diverse array of participants from key sectors across Delta State, including:

- State Ministry of Health (SMoH)
- Ministry of Agriculture and Natural Resources (M.A.N.R.)
- Ministry of Education (MOE)
- Ministry of Women Affairs
- Ministry of Works (Roads & Rural Infrastructure)
- Ministry of Works (Housing & Environment)
- Department of Monitoring and Evaluation (DMOE)

Key participants included:

- Assistant State Epidemiologist, SMoH
- Epidemiologist, SMoH
- Deputy Director, Ministry of Education
- Deputy Director, M.A.N.R.
- Director of Women Development, Women Affairs
- Deputy Director, MOW (Roads & Rural Infrastructure)
- Assistant Director, MOW (Housing & Environment)
- CSO, Ministry of Education
- Director, DMOE
- Surveillance Officer, SMoH
- Surveillance Officer, SMoH

Participants engaged both in-person at the Public Health Emergency Operations Centre in Asaba and remotely via digital platforms. A comprehensive attendance record is appended to this document.

2. Welcome Address

The proceedings commenced with a welcome address delivered by the Nigeria Centre for Disease Control (NCDC). The Program Lead extended warm greetings to all participants and emphasized the vital importance of inclusive stakeholder participation in developing environmental and social safeguards for the Health Security Program. The Program Lead highlighted that early identification of potential risks and collaborative mitigation strategies, informed by local expertise, would be instrumental to the program's success.

3. Meeting Objectives

The Consultant Facilitator outlined the following objectives for the engagement:

- To provide stakeholders with comprehensive information regarding the scope, objectives, and planned activities under the Health Security Program (HeSP)
- To solicit stakeholder insights on potential environmental and social risks that may arise during implementation
- To jointly complete a standardized Environmental & Social Safeguards Checklist
- To ensure that stakeholder contributions directly inform the development of the national Environmental and Social Management Plan (ESMP)

4. Presentation on the Health Security Program (HeSP)

Dr. Gbenga Solomon delivered a detailed presentation introducing the core interventions of the Health Security Program:

- Enhancement of public health laboratory infrastructure
- Development and expansion of health facilities (warehouses, administrative centers)
- Deployment of mobile laboratories and strengthening emergency response capabilities
- Establishment of veterinary inspection points and waste management systems
- Implementation of specimen referral networks and logistics support mechanisms
- Development of wildlife surveillance systems and One Health approaches

The presentation emphasized the necessity of aligning these interventions with international best practices, particularly the World Bank's Environmental and Social Framework (ESF).

5. Stakeholder Risk Mapping and Checklist Completion

The engagement utilized a structured risk-screening checklist, which was completed collaboratively by stakeholder groups. The assessment evaluated the probability and impact of:

- Risks to community health and safety
- Occupational hazards for healthcare and laboratory workers
- Challenges in waste management and disposal
- Environmental impacts (air quality, water resources, land use)
- Considerations for gender equity and inclusive access
- Institutional capacity gaps and grievance redress mechanisms

Participants were guided through each section of the checklist and provided support in documenting their contributions. All completed forms were collected for subsequent analysis and integration.

6. Key Issues Raised by Stakeholders (Delta-Specific Highlights)

Delta State stakeholders provided valuable context-specific insights, including:

- Coastal and Riverine Vulnerability: Participants highlighted Delta's unique geographical position

and the increased vulnerability of health infrastructure to flooding, particularly in riverine communities where access becomes severely limited during rainy seasons.

- **Biomedical Waste Management Challenges:** Concerns were expressed regarding the state's current capacity to safely handle and dispose of biomedical and hazardous waste from laboratories and healthcare facilities, with particular emphasis on riverine areas where improper disposal could contaminate water sources.
- **Occupational Safety Considerations:** Health workers and laboratory personnel reported inadequate protective equipment and insufficient training on safety protocols, especially for handling potentially infectious materials during disease outbreaks.
- **Mobile Laboratory Deployment Risks:** Stakeholders identified potential hazards associated with mobile laboratory operations, including transportation accidents in difficult terrain and community exposure during field activities.
- **Land Acquisition Sensitivities:** The potential for conflicts arising from the siting of new health infrastructure was discussed, with emphasis on the need for transparent community engagement and proper compensation mechanisms.
- **Equity in Resource Distribution:** Participants stressed the importance of ensuring that rural and underserved communities, particularly those in hard-to-reach riverine areas, receive equitable access to HeSP resources and benefits.
- **Grievance Management Systems:** The absence of effective channels for community feedback and complaint resolution was identified as a significant gap in existing institutional frameworks.

7. Integration with National Risk Profiles

The insights gathered from the Delta engagement demonstrated alignment with national patterns observed across other states, particularly regarding:

- Substantial risks in waste management systems, laboratory safety protocols, and land acquisition processes
- Moderate to substantial concerns related to emergency response logistics, community engagement, and equitable access
- Institutional weaknesses in grievance redress mechanisms and environmental monitoring capabilities

Delta's unique coastal and riverine context, however, introduced additional considerations regarding flood vulnerability and access challenges that require specific attention in planning and implementation.

8. Agreed Follow-up Actions

Stakeholders endorsed the following recommendations:

- **Risk Integration:** The Delta-specific checklist will be incorporated into the national safeguards planning framework for HeSP implementation.
- **Tailored Safeguard Instruments:** Development of Delta-specific Environmental and Social Impact Assessments (ESIA) and Environmental and Social Management Plans (ESMP), with particular attention to waste management in riverine communities.
- **Capacity Enhancement:** Implementation of targeted training programs for frontline health workers on occupational safety, environmental safeguards, and risk communication strategies.

- **Strengthened Feedback Mechanisms:** Development of accessible grievance reporting channels, including mobile-based solutions appropriate for remote communities.
- **Equity Monitoring Framework:** Establishment of regular audits to track inclusion of marginalized groups and ensure equitable distribution of program benefits across all local government areas.

9. Closing Remarks

The meeting concluded with closing statements from both the host and facilitator. The Program Lead reaffirmed NCDC's dedication to environmental and social safeguard compliance and expressed appreciation for Delta State's active participation. The Consultant emphasized that stakeholder contributions would serve as the foundation for implementation strategies, risk mitigation approaches, and accountability mechanisms throughout the HeSP initiative.

Note: This minute was prepared by the meeting facilitator in accordance with the engagement's documentation protocol, ensuring an objective and technically accurate representation of stakeholder contributions.

Date: 13th May 2025