FEDERAL REPUBLIC OF NIGERIA

MINISTRY OF FINANCE

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

Draft Stakeholder Engagement Plan
AUGUST 2019

ACRONYMS

ACE	Africa Center of Excellence
BPP	Bureau of Public Procurement
CBN	Central Bank of Nigeria
CE	Center of Excellence
CPAR	Country Procurement Assessment Report
CPF	Country Partnership Framework
CPS	Country Partnership Strategy
DLI	Disbursement-linked indicator
DLR	Disbursement-linked results
EA	Environmental Assessment
E&S	Environment and Social
EAD	Environmental Assessment Department at the Ministry of Environment (also EA Department)
EEP	Eligible expenditure program
EIA	Environmental Impact Assessment Act
ERGP	Economic Recovery and Growth Plan
ES	Environmental Standards
ESF	World Bank Environmental and Social Framework
ESMP	Environmental and Social Management Plan
FGD	Focus Group Discussion
FGIP	Fiscal Governance and Institutions Project
FGN	Federal Government of Nigeria
FMWASD	Federal Ministry of Women Affairs & Social Development
FU	Federal University
GIFMIS	Government Integrated Financial Management System
IA	Implementing Agency
ICT	Information and Communication Technology
IFR	Interim Financial Report
INFU	Independent National Facilitation Unit
IPF	Investment Project Financing
IPPIS	Integrated Payroll and PEronnel Information System
ITCILO	International Training Center of the Intetnational Labor Organization
ITPV	Independent Certified Third-Party Verifiers
IVA	Independent Verification Agent
KII	Key Informant Interview
LMS	Learning Management System
M&E	Monitoring and Evaluation
MDAs	Ministries, departments, and agencies
MOF	Ministry of Finance (also FMoF)
NERGP	National Economic Recovery and Growth Plan (also ERGP)
nGRen	Nigerian Research and Education Network
NESREA	National Environmental Standards and Regulations Enforcement Agency
NPVCA	Nigerian Procurement Value Chain Analysis
NUC	National Universities Commission
OAuGF	Office of the Auditor General of the Federation

OCDS	Open Contracting Data Standards
PEMFAR	Public Expenditure Management and Financial Accountability Review
PES	Procurement, Environment and Social
PFA	Performance and Funding Agreement
PIFANS	Programmatic Integrated Fiduciary Assessment of Nigeria States
PIU	Project implementation unit
PP	Public Procurement
PS	Procurement Standards
PSGRDP	Public Sector Governance Reform and Development Project
SEEFOR	State Employment and Expenditure for Results
SFTAS	States Fiscal Transparency, Accountability and Sustainability
SLOGOR	State and Local Governance Reform
SORT	Systematic Operations Risk Tool
SPESSCE	Sustainable Procurement, Environmental and Social Standards Centers of Excellence
SPESSE	Sustainable Procurement, Environmental and Social Standards Enhancement
SS	Social Standards
TA	Technical Assistance
TOR	Terms of Reference
TWG	Technical Working Group

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1.0 Introduction

The Sustainable Procurement, Environmental and Social Standards Enhancement (SPESSE) Program is an $80 Million capacity building project targeted at sustainably enhancing capacity in managing procurement, environment and social (E&S) standards in the public and private sectors in Nigeria. This project is critical to the Government of Nigeria as it contributes directly to the current administration's Economic Recovery and Growth Plan (ERGP), which is aimed at accelerating structural reforms to alleviate increasing poverty and inequality by: bringing consistency to the monetary and fiscal policy, spurting job-creation through policies consistent with private sector development, and creating sustainable fiscal space for desperately needed investments in human and physical capitals and importantly, reduce the cost of governance.

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

The SEP is a participatory tool designed to provide guidance on how the various agencies involved in the SPESSE program would identify, map/categorize, engage and maintain a responsive and transparent communication line with their immediate and wider publics. The SEP is crucial to the overall project goal because the role of every stakeholder is important to the successful implementation of the project. This SEP is established alongside the Environmental and Social Commitment Plan (ESCP) and provides guidelines for stakeholder engagement during preparation and implementation of the project. It would also guide the disclosure process for the entire SPESSE program.

This SEP is a living document, open for updates throughout the project lifecycle. It will be:

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

This SEP offers an overall framework that will guide stakeholder engagements throughout the duration of SPESSE project. It will, however, be updated from time to time to adapt its activities towards the particular project needs during implementation. Although this initial SEP has been developed with significant input from the Bank, overall stakeholder engagement will be carried out by the key implementing agencies and subsequent activities would be captured to update the draft at a strategic level, by each implementing agency.

1.1 Project Background

One of the key impediments to achieving efficiency and effectiveness of public investments is the lack of adequate Procurement, Environmental and Social (PES) systems capacity in the country, which are major factors in improving governance and delivery. This is in addition to the lack of reliance on digital technologies and capitalizing on the digital economy. Procurement, environmental and social standards is strategic to achieving the government goals because of the rising poverty level which has been linked to poor procurement related practices which is prone to corruption and wastage. Losses relating to poor procurement practice is significant to the nation because approximately 60 percent of the Nigerian budget expenditure passes through the procurement process. The government has been implementing some reforms in the procurement process with its development partners but there still remains the challenge of these reforms trickling down to the state government and local government level. There is also the lack of adequate procurement capacity due to the absence of capacity development strategy and a shortage in the number of qualified procurement professionals. This necessitates an urgent need to strengthen procurement institutions and systems to improve transparency and accountability in procurement.

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

This project is in response to the significant gaps identified in the procurement, environmental and social sectors in the governance of the Nigerian economy.

1.2 Project Description

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

The cornerstone of this project is the creation of Centers of Excellence (SPESSCE) in Nigerian Universities to deliver a number of capacity building tracks in a sustainable manner in procurement, environmental and social standards. To accompany such an initiative, key stakeholders are involved in strategic design and will be effectively engaged in implementation and monitoring. This capacity development project is strategically and operationally planned in an aligned and coordinated manner across all tiers of government and involving all stakeholders (national and sub-national government, development partners, NGO's, private sector, etc.). Additionally, it is tightly linked to a real-time performance and change management program. This creates continued urgency for using the newly developed capacities, and it creates a feedback loop from learning to performance which in turn helps inform curriculum design/enhancement and instruction delivery mechanisms. The adopted methodology will ensure a holistic approach to the elevation of capacities in Nigeria in full reliance on technology and E-learning tools and facilities.

1.3 Project Components

This multi-disciplinary project is composed of two main components
a. Component I: Technical assistance and Support to implementing agencies; and
b. Component II: Establishment and operating the Centers of Excellence (SPESSCE).

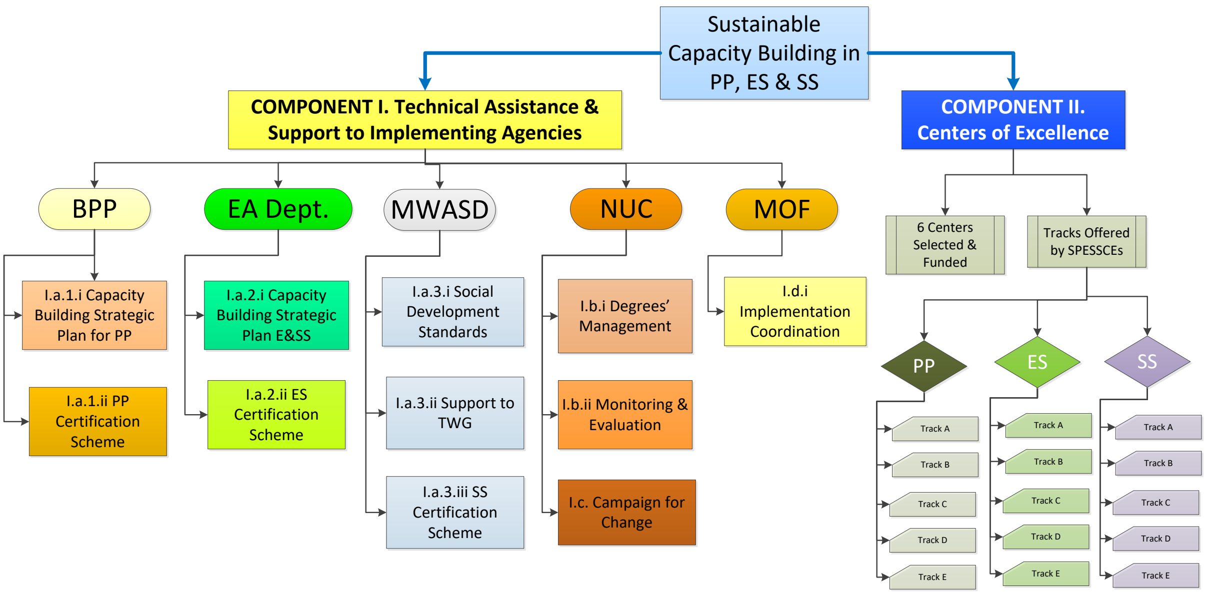
Project Sub-Components:
Component I is composed of the following sub-components:

c. Technical Assistance and DLI-based Support to Bureau of Public Procurement (BPP), Environmental Assessment Department and Federal Ministry of Women Affairs & Social Development
d. Technical Assistance and DLI-based Support to National Universities Commission (NUC)
e. Technical Assistance to NUC for the Campaign for Change
f. Technical Assistance to the Ministry of Finance (MoF)

Component II is composed of the following sub-components:

g. Funding support to the CE to facilitate project startup
h. DLI-based support to operating the CEs

Graphic Illustration of SPESSE project Components



1.4 Applicable World Bank Environmental Social Standards (ESSs)

ESS1 Assessment and Management of Environmental and Social Risks and impacts:
The expected environmental and social impacts of the project will be generally positive by enhancing quantity, quality and relevance of PES skills development in Nigeria. Following the selection of the participating institutions (under Component II) and indication of locations of project activities in the 6 participating SPESSCEs and to manage environmental and social impacts, an Environmental and Social Management Plan (ESMP) will be prepared, consulted upon for each eligible investment, reviewed

and disclosed before Board approval. Participating institutions and locations selected after appraisal will prepare, review and disclose an ESIA or an ESMP before commencement of project activities for each eligible investment. Environmental risks are expected to be low and their mitigation will be guided by national and local laws and procedures.

ESS2 Labour and working conditions:

The PIUs, at minimum, will include direct workers, and will need to meet requirements for terms and conditions of employment; non-discrimination and equal opportunity; worker's organizations; child labor; forced labor; a grievance mechanism; and occupational health and safety plans. Stakeholders and beneficiaries working in connection with the project full-time or part-time will remain subject to the terms and conditions of their existing public sector employment or agreement, unless there has been an effective legal transfer of their employment or engagement in the project. The project includes a condition of effectiveness for Labor Management Procedures for both the PIU staff and for workers receiving salaries. The project will also include an Occupational Health and Safety (OHS) procedures or plans and a grievance mechanism for labor disputes.

ESS3 Resource Efficiency and Pollution Prevention and Management:

ESS3 is not relevant at this stage, as the project will not finance activities that involve energy efficiency or pollution prevention and management.

ESS4 Community Health and Safety:

The project will include a specific project-related GBV risks assessment and an integrated GBV mitigation and response plan which will be incorporated into the project to address potential sexual and workplace harassment.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement:

The project will not finance activities that involve land acquisition leading to physical and economic displacement including access to resources. However, prior to commencement of rehabilitation work, site-specific ESMPs will be prepared, consulted upon and disclosed.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources:

The project does not involve biodiversity conservation and sustainable management of living natural resources.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities:

There are no identified Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area.

ESS8 Cultural Heritage:

The project will not finance activities that will affect cultural heritage.

ESS9 Financial Intermediaries:

This project is not an FI operation.

ESS10 Stakeholder Engagement and Information Disclosure:

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

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

1.5 Stakeholder Engagement within the context of SPESSE

The underlying principle of stakeholder engagement for the project will be that engagement shall be: a) free of manipulation, b) free of interference, coercion, and intimidation, and conducted based on timely, relevant, understandable and accessible information, in a culturally appropriate format. It shall involve interactions between project's stakeholders and shall provide stakeholders with an opportunity to raise their concerns and opinions and shall ensures that this information is taken into consideration when designing the project and making decisions.
The project's stakeholder's engagement aims at creating a "social licence"[1] and will depend on mutual trust, respect and transparent communication between SPESSE and its stakeholders. It will thereby improve decision-making and environment and social performance. This could lead to managing costs and risks, enhancing reputation, avoiding conflict, improving corporate policy, identifying, monitoring and reporting on impacts, and managing stakeholder expectations.

1.6 Principles for effective stakeholder engagement

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

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

1.7 Overall objectives

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

- To identify the roles and responsibility of all stakeholders and ensure their participation in the complete project cycle

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

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

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

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1.8 Structure of Stakeholder Engagement Plan

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

2.0 Stakeholder Engagement Regulatory Context
3.0 Stakeholder Identification and analysis
4.0 Stakeholder Engagement Program
5.0 Grievance Redress Mechanism
6.0 Monitoring and Reporting

2.0 Stakeholder Engagement Regulatory Context

This section presents a brief overview of the national legal provisions that necessitates citizenship engagement, disclosure of public information and adequate response to queries, concerns and grievances raised by the public on key government actions. This chapter would also explore the bank position on stakeholder engagement among other best practices.

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

2.1.1 The Freedom of Information Act

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

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

2.1.2 Constitution of the Federal Republic

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

2.1.3 Land Use Act of 1978

The Land Use Act as amended (Chapter 2002), stipulates principles of land tenure, rents, revocation of rights of occupancy and compensation thereof, jurisdiction of courts, prohibitions and penalties, etc. The Act gives the Government the right to acquire land by revoking both Statutory and Customary Rights of Occupancy for overriding public interest. In doing so, The Act stipulates that the state or Local Government should pay compensation to the stakeholder. For example, if a right of occupancy is revoked for the cause set out, the stakeholder shall be entitled to compensation for the value at the date of revocation of their un-exhausted improvements.

2.1.4 Nigerian Environmental Assessment Law

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

2.1.5 Other Legal Provisions on Stakeholder Engagement and Disclosure

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

2.2 World Bank Environmental and Social Standard on Stakeholder Engagement

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

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

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

3.0 Project Stakeholder identification and Analysis

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

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

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

(iii) May have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

3.1 Stakeholder Categorization

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

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

3.1.1 Implementing Agencies

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

- Federal Ministry of Finance (FMoF);
- Federal Ministry of Women Affairs and Social Development (FMWSD);
- Technical Working Group (TWG) on Social Development (Ministry of Women and Social Development, Ministry of Labour and Productivity, and Ministry of Power, Works and Housing);
- The EA Department of the Federal Ministry of Environment;
- Bureau of Public Procurement (BPP); and
- Nigerian University Commission (NUC)

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

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

3.1.2 Affected Parties

This comprise of persons, groups and other entities studying at one of the implementing Nigerian Universities who will be recipients/beneficiaries of the capacity building program. This group is the core target audience and will be directly affected by the project implementation or/and outcomes. A subset of this category are the vulnerable groups. A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the program. Vulnerable Groups are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status[2], and that may require special engagement efforts to ensure their equal representation in the consultation and participation in the program. In terms of gender equality, the project target is to include at least 30% female trainees in the program.

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

3.1.3 Interested Parties

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

- The local population who can benefit indirectly from the capacity building program;
- Residents and business entities, and individual entrepreneurs in the area of the project that can benefit from the capacity training program;
- Local procurement consultancies who can support in the delivery of the SPESSE program;
- Environmental, protection authorities;
- Local, regional and national level civil societies and non-governmental organizations (NGOs) with an interest in PES safeguards;
- Other government ministries and regulatory agencies at regional and national levels including environmental, technical, social development and labor authorities;
- SPESSE employees and contractors; and
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations.

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

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

4.0 Stakeholder Engagement Plan

4.1 The goal of the project's Stakeholder Engagement Plan is to promote and provide means for effective, inclusive, accessible and, meaningful engagement with project- affected parties throughout the project life -cycle on issues that could potentially affect their livelihoods and properties.

4.2 While advancing effective, inclusive and, meaningful engagement with project- affected parties, the SPESSE, through PMUs, shall conduct consultations that will ensure two-way communication processes.

4.3 The objective of the engagement and consultations plan under the project is to:

(a) Begin early in the project planning process to gather initial views on the project proposal and inform project design;

(b) Encourage stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;

(c) Ensure that stakeholders have an understanding of how the project is likely to affect them

(d) Ensure consistency in messaging

(e) Continue engagement on an ongoing basis as risks and impacts arise and manage stakeholders' expectations;

(f) Ensure prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;

(g) Consider and responds to feedback;

(h) Support active and inclusive engagement with project-affected parties;

(i) Ensure that consultation(s) is/ are free of external manipulation, interference, coercion, discrimination, and intimidation; and

(j) Ensure consultation (s) is/are documented and disclosed by the SPESSE

4.4 Engagement Methods and Tools

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

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

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

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

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

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

- **Placement of the project materials in the public domain** is also accompanied by making available a register of comments and suggestions that can be used by any member of the affected parties, other stakeholders and general public to provide their written feedback on the contents of the presented materials. As a rule, the register is made available for the entire duration of the requisite disclosure period. Where necessary, a project representative or an appointed consultant should be made available to receive and record any verbal feedback in case some stakeholders experience a difficulty with providing comments in the written form.
- **Drafting an agenda for the consultation meeting** is an opportunity to provide a clear and itemized outline of the meeting's structure, sequence, chairpersons, a range of issues that will be discussed and a format of the discussion (e.g. presentation/ demonstration followed by a Questions & Answers – Q&A session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the mutual exchange of ideas). A clearly defined scope of issues that will be covered at the meeting gives the prospective participants an opportunity to prepare their questions and comments in advance. It is essential to allocate a sufficient amount of time for a concluding Q&A session at the end of any public meeting or a hearing. This allows the audience to convey their comments and suggestions that can subsequently be incorporated into the design of the project. Keeping a record of all public comments received during the consultations meetings enables the project's responsible staff to initiate necessary actions, thereby enhancing the project's overall approach taking onto consideration the stakeholders' priorities. The recorded comments and how they have been addressed by the project becomes an appropriate material for inclusion in the project's regular reporting to the stakeholders.

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

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

activities of the Project, as well as associated benefits and outcomes? What aspects of the meeting do they particularly appreciated or would recommend for improvement?

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

- **Distribution of targeted invitations to the consultation meeting or a hearing** is an important element of the preparation process and is based on the list of participants that is compiled and agreed in advance of the consultation. Invitations may be sent both to certain individuals that have been specifically identified as relevant stakeholders (e.g. representatives of government ministries and agencies) and as public invitees (e.g. addressed to initiative and professional bodies, local organizations, and other public entities). Text of individual invitations can be tailored to reflect the specifics of an invitee and their role in the process, whereas the text of public invitations normally indicates general details. Means of distributing the invitations should be appropriate to the customary methods of communication that prevail for the stakeholder. Depending on the availability and technical feasibility, the following means of distribution can be used: direct mail (post); as an inclusion with other existing public mailings, utility bills, or circulates from a local authority. The invitation should typically contain a clear request for confirmation of the participation, also specifying a date by which the confirmation is expected. All invitations that were sent out are tracked in order to determine and manage the response rate. If no response has been received, the invitation can be followed up by a telephone call or e-mail where possible.

4.5 Description of Engagement Methods

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

A summary description of the engagement methods and techniques that will be applied by project developer is provided in **Error! Reference source not found.** below. The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.

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

In most cases and as a general practice, the introductory initial part of the meeting should be delivered in a format that is readily understandable to the audience of laypersons and should be free of excessive technical jargon. If necessary, preference should be given, whenever possible, to the oral and visual methods of communication (including presentations, pictorials, illustrations, graphics and animation) accompanied by hand-out materials imparting the relevant information in understandable terms rather than as text laden with technical intricacies. Where technical specifics of the project's particular activities or solutions are required to be delivered in a greater level of detail, it will be ensured that the information conveyed remains comprehensible to all members of the audience and that the description of complex technicalities is adapted to their level of understanding, thereby enabling productive feedback and effective discussion.

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

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

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

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

Table 1 shows some tools for engagement for information disclosure and feedback.

Table 1: Methods/Tools for Information Provision, Feedback, Consultation and Participation

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Information Provision				
Distribution of printed public materials: leaflets, brochures, fact sheets	Used to convey information on the Project and regular updates on its progress to local, regional and national stakeholders.	Printed materials present illustrative and written information on the SPESSE program. Presented contents are concise, clear and easy to understand by a layperson reader. Graphics and pictorials are widely used to describe technical aspects and aid understanding.	Distribution as part of consultation meetings, awareness campaigns, discussions and meetings with stakeholders.	▪ Government Ministries, Departments and Agencies ▪ All project affected parties ▪ Project interested parties ▪ Other potential stakeholders
Distribution of printed public materials: newsletters/ updates	A newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of Project achievements, announcements of planned activities, changes, and overall progress.	Circulation of the newsletter or update sheet with a specified frequency in the Project Area of Influence, as well as to any other stakeholders that expressed their interest in receiving these periodicals. Means of distribution – post, emailing, electronic subscription, delivery in person. The mailed material can be accompanied by an enclosed postage-paid comment/feedback form that a reader can fill in a return to the Project's specified address.	▪ All projected affected parties ▪ All project interested parties ▪ Implementing Universities ▪ Government Ministries, Departments and Agencies

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Printed advertisements in the media	Inserts, announcements, press releases, short articles or feature stories in the printed media – newspapers and magazines	Notification of forthcoming public events or commencement of specific Project activities. General description of the Project and its benefits to the stakeholders.	Placement of paid information in local, regional and national printed media, including those intended for general reader and specialised audience	▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders
Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV.	Description of the Project, Project development update and processes. Advance announcement of the forthcoming public events or commencement of specific Project activities.	Collaboration with media producers that operate in the region and can reach local audiences.	▪ Government Ministries, Departments and Agencies ▪ Implementing universities ▪ All projected affected parties All project interested parties Other potential stakeholders
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project activities, processes and timeline. Updates on Project development.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	▪ Participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. ▪ Government Ministries, Departments and Agencies
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, post offices, shop, local administrations.	▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Information Feedback				
Information repositories accompanied by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various Project-related materials and documentations.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience are also given free access to a register of comments and suggestions.	▪ All projected affected parties ▪
Dedicated telephone line (hotline)	Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations and environmental protection.	Any issues that are of interest or concern to the direct project beneficiaries and other stakeholders.	Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.	▪ Any project stakeholder and interested parties.
Internet/Digital Media	Launch of Project website to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public.	Information about Project operator and shareholders, Project development updates, employment and procurement, environmental and social aspects.	A link to the Project web-site should be specified on the printed materials distributed to stakeholders. Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based	▪ Project stakeholders and other interested parties that have access to the internet resources.

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

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
	regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.	including a presentation and an interactive Questions & Answers session with the audience.	relevant details, including notifications in local, regional and national mass media. Targeted invitations are sent out to stakeholders. Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing. Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period.	▪ Relevant government Ministries Departments and Agencies. ▪ NGOs and civil societies ▪ Other interested parties
Focus Group Discussions and Round Table Workshops	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, processes that require detailed discussion with affected stakeholders.	Announcements of the Forthcoming meetings are widely circulated to participants in advance. Targeted invitations are sent out to stakeholders.	▪ All project affected parties especially vulnerable groups; ▪ Project delivery agencies ▪ SPESSE employees and contractors ▪ NGOs and civil societies ▪ Implementing Universities ▪ Relevant Government Ministries and Agencies
Project Implementation Units (PIUs)	Project's designated venue for depositing Project-related information that also offers open hours to the stakeholders and other members of the public, with Project staff available to respond	Project-related materials. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the info centre or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as	▪ All project affected parties ▪ Project interests' parties ▪ Other potential stakeholders

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
	to queries or provide clarifications.		well as during public meetings and household visits.	

4.6

Description of Information Disclosure Methods

As a standard practice, this SEP in English will be released for public review for the period of 30 days in accordance with Nigerian regulatory frameworks (outlined in chapter 2). Distribution of the disclosure materials will be through making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access. Free printed copies of the SEP in English will be made accessible for the general public at the following locations:

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

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

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

4.3.1 Timetable for Disclosure

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

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

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

The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table 2 below provides a description of stakeholder engagement and disclosure methods recommended to be implemented during stakeholder engagement process.

Table 2: Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
Project Affected Parties	Stakeholder Engagement Plan; Public Grievance Procedure; Regular updates on Project development.	Public notices. Electronic publications and press releases on the Project web-site. Dissemination of hard copies at designated public locations. Press releases in the local media. Consultation meetings. Information leaflets and brochures. Separate focus group meetings with vulnerable groups, as appropriate.
Non-governmental Organizations	Stakeholder Engagement Plan; Public Grievance Procedure; Regular updates on Project development.	Public notices. Electronic publications and press releases on the project web-site. Dissemination of hard copies at designated public locations. Press releases in the local media. Consultation meetings. Information leaflets and brochures.
Ministries, Departments and Agencies	Stakeholder Engagement Plan; Regular updates on Project development; Additional types of Project's information if required for the purposes of regulation and permitting.	Dissemination of hard copies of the ESMF, ESMP package, and SEP at municipal administrations. Project status reports. Meetings and round tables.
Implementing Universities	Stakeholder Engagement Plan; Regular updates on Project development; Additional types of Project's information if required for the purposes of implementation and timeline.	Public Notices Consultation Meetings Information leaflets and brochures.

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
Related businesses and enterprises	Stakeholder Engagement Plan; Public Grievance Procedure; Updates on Project development and tender/procurement announcements.	Electronic publications and press releases on the Project web-site. Information leaflets and brochures. Procurement notifications.
Project Employees	Employee Grievance Procedure; Updates on Project development.	Staff handbook. Email updates covering the Project staff and personnel. Regular meetings with the staff. Posts on information boards in the offices and on site. Reports, leaflets.

5.0 Grievance Management

In compliance with applicable local and national laws and essentially the World Bank's ESS10, a project-specific mechanism is being set up to handle complaints and issues. This process would be specially designed to collect, collate, review and redress stakeholders' concerns, complaints and grievances. This process will be carried out using dedicated communication materials (specifically, a GRM brochure or pamphlet) which will be developed to help stakeholders become familiar with the grievance redress channels and procedures. Locked suggestion/complaint boxes will be posted in each implementing agency and university and they will maintain a grievance register in order to capture and track grievances from submission to resolution and communication with complainants. Project website (and that of the implementing agencies) will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder. It will also provide information on the way grievances will be handled, both in terms of process and deadlines.

5.1 Grievance Redress Mechanism (GRM)

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

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

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

5.2 Grievance Resolution Framework

Information about the GRM will be publicized as part of the initial program consultations and disclosure in all the participating agencies. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project implementation unit offices, notice boards available to strategic stakeholders, etc. Information about the GRM will also be posted online at the universities' and other implementing agencies' websites.
The overall grievance resolution framework will include six steps described below. The six steps demonstrate a typical grievances resolution process.

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

- ***Step 2: Sorting and processing.*** Each unit / department of the implementing institutions will conduct a prompt sorting and processing of all grievances. The processing will involve the internal escalation process to specific desks to review, resolve and respond to grievances raised.
- ***Step 3: Acknowledgement and follow-up.*** Within seven (7) days of the date a complaint is submitted, the responsible person within the unit will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. The information provided to complainant would also include, if required, the likely procedure if complaints had to be escalated outside the unit and the estimated timeline for each stage.
- ***Step 4: Verification, investigation and action.*** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

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

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

5.3 SPESSE Grievance Escalation Process

GRM Stage One - Specific Implementing Department Level Resolve

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

GRM Stage Two – Implementing Agency Level Resolve
The stage two is a grievance redress platform led by the main implementing agencies. Every implementing agency would establish a grievance management unit which would deal with all the grievances escalated to it from the different units. These implementing agencies would apply the stage four as mentioned under the framework to address and resolve all grievances promptly and communicate the feedback to the complainants. Any complaints or grievances not resolved at this stage shall be escalated to the SPESSE Ombudsman.

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

5.4 Grievance logs

Each implementing agency shall establish a grievance uptake point.

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

5.5 Monitoring and reporting on grievances

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

5.6 Points of contact

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

The point of contact regarding the stakeholder engagement program are:

Federal Ministry of Environment

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

Federal Ministry of Women Affairs and Social Development

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

Federal Ministry of Finance

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

Bureau of Public Procurement

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

Nigeria Universities Commission

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

5.7 World Bank Grievance Redress System

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

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

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported project. This should be supported by available documentation and correspondence to the extent possible. The complainant may also indicate the desired outcome of the complaint. Finally, the complaint should identify the complainant(s) or assigned representative/s, and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns.
In addition, project-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or could occur, as a result of the World Bank's non-compliance with its policies and procedures. Complaints may be submitted

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

6.0 Monitoring and Reporting

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

6.1 Reporting

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project(s). The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.
Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

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

6.2 Training

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

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