



FEDERAL MINISTRY OF WATER RESOURCES

**STAKEHOLDERS ENGAGEMENT PLAN
FOR
NIGERIA SUSTAINABLE RURAL WATER SUPPLY AND SANITATION SECTOR PROJECT
(P170734)**



MARCH, 2021

ACRONYMS

AP	Action Plan
CBO	Community Based Organizations
CERC	Contingency Emergency Response
DP	Development Partners
EA	Environmental Assessment
E&S	Environment and Social
EIA	Environmental Impact Assessment Act
ES	Environmental Standards
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standards
ESF	World Bank Environmental and Social Framework
ESMP	Environmental and Social Management Plan
FGD	Focus Group Discussion
FGN	Federal Government of Nigeria
FMoE	Federal Ministry of Education
FMoFBNP	Federal Ministry of Finance, Budget and National Planning
FMoH	Federal Ministry of Health
FMWA	Federal Ministry of Women Affairs
FMW&H	Federal Ministry of Works, Power and Housing
FMWR	Federal Ministry of Water Resources
FPIU	Federal Project Implementation Unit
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
KPI	Key Performance Indicator
LGA	Local Government Area
LMP	Labour Management Plan
NGO	Non-Governmental Organization
NGSRWSSSP	Nigeria Sustainable Rural Water Supply and Sanitation Sector Project
O&M	Operation and Maintenance
PAPs	Project Affected Persons
PIP	Project Interested Persons
PEWASH	Partnership for Expanded Water Supply, Sanitation and Hygiene
RPF	Resettlement Policy Framework
RUWASSA	Rural Water Supply and Sanitation Agency
SDG	Sustainable Development Goal
SEP	Stakeholder Engagement Plan
SMWR	State Ministry of Water Resources
STOWSSA	Small Towns Water Supply and Sanitation Agency
WASH	Water, Sanitation and Hygiene
WASHCOM	Water, Sanitation and Hygiene Committee
WB	World Bank

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
1.1	Project Description.....	1
1.2	Project Components	2
1.3	Stakeholder Engagement Plan and Disclosure	4
1.4	Stakeholder Engagement within the context of Nigeria Sustainable Rural Water Supply and Sanitation Sector project	4
1.5	Principles for Effective Stakeholder Engagement.....	4
1.6	Overall Objectives.....	5
1.7	Limitation.....	5
1.8	Structure of Stakeholder Engagement Plan.....	5
2.0	SUMMARY OF REGULATORY FRAMEWORK AND STANDARDS.....	7
2.1	Key National Legal Provisions for Environmental and Social Safeguards and Citizen Engagement... 7	7
2.1.1	The Freedom of Information Act	7
2.1.2	Constitution of the Federal Republic.....	7
2.1.3	Environmental Impact Assessment (EIA) Act CAP E12, LFN 2004.....	7
2.1.4	National Orientation Agency (NOA) Act, 1993.....	7
2.1.5	Water Resources Act, 2004 CAP W2, LFN 2004	7
2.1.6	River Basins Development Authority Act, CAP R9, LFN 2004.....	8
2.1.7	Other Legal Provisions on Stakeholder Engagement and Disclosure	8
2.2	World Bank Environmental and Social Standard on Stakeholder Engagement.....	8
3.0	STAKEHOLDER IDENTIFICATION AND ANALYSIS.....	9
3.1	Stakeholder Identification	9
3.2	Stakeholder Categorization	9
3.2.1	Implementing Agencies.....	9
3.2.2	Project Affected Parties	10
3.2.3	Project Interested Parties	10
3.3	Stakeholder Analysis.....	15
3.4	Stakeholder Mapping	15
4.0	STAKEHOLDER ENGAGEMENT PLAN.....	17
4.1	Summary of Stakeholder Consultations to Date	22
4.1.1	National Stakeholder’s Consultation Workshop on Nigeria Sustainable Rural Water Supply and Sanitation Sector project.....	22
4.1.2	Stakeholder Engagement Planning Workshop	22
4.2	Engagement Methods and Tools.....	23
4.3	Description of Disclosure Methods.....	30
5.0	GRIEVANCE MANAGEMENT	32
5.1	Grievance Redress Mechanism (GRM)	32
5.2	Grievance Resolution Framework.....	33
5.3	Grievance Escalation Process.....	33
5.4	Grievance logs.....	34
5.5	Monitoring and reporting on grievances.....	34
5.6	Point of Contact.....	34
5.7	World Bank Grievance Redress System	35
6.0	MONITORING AND REPORTING	36
6.1	Reporting.....	36
7.0	Further consultations	37
8.0	REFERENCES.....	38
	ANNEX I: PICTORIALS	39

LIST OF TABLES

Table 1: How the result areas support the National Objectives of National Action Plan supported by SURWASH PforR

Table 2: List of Stakeholders Identified and Potential Involvement

Table 3: Stakeholder Mapping

Table 4: Stakeholder Engagement Plan Framework

Table 5: Stakeholder Engagement Techniques

Table 6: Methods/Tools for information Provision, Feedback, Consultation and Participation

Table 7: Stakeholder Engagement and Disclosure Method

1.0 INTRODUCTION

The Federal Government of Nigeria has strengthened its commitment towards improving access to water supply, sanitation and hygiene (WASH) services spurred on by a comprehensive analysis included in the WASH Poverty Diagnostic for Nigeria published in 2017. This analysis confirmed with alarming detail the degree to which Nigeria's WASH sector is underdeveloped compared with its regional counterparts. This led to the President declaring a State of Emergency in 2018 and launching the National Action Plan for the Revitalization of Nigeria's Water and Sanitation Sector (AP), a 13-year strategy aimed at ensuring universal access to sustainable and safely managed WASH services by 2030, commensurate with the Sustainable Development Goals (SDGs).

As described by the NAP, Nigeria's WASH sector requires a paradigm shift to move beyond the low access rates and poor service quality that continue to plague its people. While previous projects have financed infrastructure and supported policy and institutional development, much of the sector's infrastructure are poorly utilized, its policies are seldom operationalized, and its institutions remain weak. This program of result (PforR) project is designed to introduce an innovative approach to sector programming that leverages incentives to simultaneously deliver infrastructure that works, policies that govern, and institutions that sustain. The technical assistance (TA) provided under the IPF component will address critical institutional development and capacity gaps within implementing institutions. The Program is fully aligned with the World Bank 2021–25 Country Partnership Framework for Nigeria, as well as Nigeria's Economic Reform and Growth Plan for 2017–20 and the Government's Economic Sustainability Plan (ESP) to respond to the economic crisis induced by COVID-19.

This document presents the Stakeholder Engagement Plan (SEP) for the Nigeria Sustainable Rural Water Supply and Sanitation Sector Project. The project intends to increase access to water, sanitation, and hygiene services and to strengthen capacity for service delivery in selected rural areas and small towns of Nigeria.

The Stakeholders Engagement Plan (SEP) is a participatory tool designed to provide guidance on how the various agencies involved in the Nigeria Sustainable Rural Water Supply and Sanitation Sector project would identify, map/categorize, engage constructively and maintain a responsive and transparent communication line with their stakeholders. 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 provides guidelines for stakeholder engagement during preparation and implementation of the project. It would also guide the disclosure process for the Nigeria Sustainable Rural Water Supply and Sanitation Sector project.

1.1 Project Description

The Nigeria Sustainable Urban and Rural Water Supply, Sanitation and Hygiene Program (P170734) is a US\$640 million Program-for-Results (PforR) with a US\$60 million Investment Project Financing (IPF) component, which introduces a results-based approach with the potential to propel Nigeria's efforts to ensure that all its people have access to sustainable and safely managed WASH services. The Project Development Objectives (PDO) are to increase access to water, sanitation, and hygiene services and to strengthen sector institutions in select states of Nigeria.

This project represents a step-in achieving Nigeria's goal to ensure that all Nigerians have access to sustainable and safely managed WASH services in rural areas. Given the tremendous challenge at hand, the World Bank plans a long-term engagement in the rural WASH sector involving multiple projects and leveraging other activities in the country portfolio to promote sector reforms and deliver on the human capital agenda. This project will focus not only on improving access to WASH services in selected states, but on establishing the policies, regulations, procedures, institutional frameworks, and supply chain and infrastructure management models required to improve sector performance over the long-term along

critical dimensions including: governance, technology and technical competency, ownership, private sector participation, Monitoring & Evaluation, access to finance, sustainability, inclusion, and resilience.

1.2 Project Components

Due to nature of the project, the PforR component is a \$640M while the IPF component is a \$60M. The Program's Results Areas under the USD\$640 M performance-based financing component are: RA 1. Strengthened Sector Policies and Institutions for Improved Services and RA 2. Improved access to water supply, sanitation and hygiene services.

Table 1: How the result areas support the National Objectives of National Action Plan supported by SURWASH PforR

National Action Plan Components	Relevant SURWASH Results Areas and DLIs	Select State and Federal Reforms Incentivized through SURWASH
Governance	RA 1	<p>State: Establish and build capacity of state and local level WASH institutions, including independent regulatory agency and autonomous urban water utility; Board of Directors, professional management team, E&S Performance, and performance contracts within urban utilities</p> <p>Federal: Provision of technical assistance to state institutions</p>
Sustainability	RA 1 and RA 2	<p>State: Develop and enforce infrastructure quality standards; provision of technical support to WASHCOMs/WCAs; water quality monitoring; improve O&M; Risk and Resilience Plans; Emergency Response Plans, Improve E&S Management Systems</p>
Sanitation	RA 1 and RA 2	<p>State: Support Clean Nigeria: Use the Toilet campaign; establish urban sanitation authority; consolidate institutional and regulatory reforms; strengthened capacity; performance contracts between public authority and private operators; citywide inclusive sanitation; scale up behavior change and education campaigns</p>
Funding & Financing	RA 1 and RA 2	<p>State: Approved cost recovery, tariff, and subsidy policies; tariff studies; improved service provider financial management; improved billing and collections; approved and sufficient budget allocation and release</p> <p>Federal: National WASH Fund</p>
Monitoring & Evaluation	RA 1	<p>Federal and State: Establish and operationalize national WASH MIS system</p> <p>State: Annual reporting by local and state WASH MDAs</p>

Component Technical Assistance Activities (US\$60 million IDA).

The IPF component supports technical assistance activities within sector agencies at both the Federal and state level. Specific support activities, managed by the responsible implementation agency, include:

- **Sector Policy and Strategy Support to the FMWR.** To improve the efficiency of program activities and promote sustainability and resilience of built infrastructure, this technical support package will assist the FMWR in developing policies, guidelines, and strategies that can be easily implemented and adapted in the differing contexts across Nigeria. It will also develop their capacity for overall program coordination and results-verification. This support will assist *inter alia* in the development of: (a) advisory services for performance improvement of urban utilities, including through different types of PPP arrangements; (b) advisory services for the improvement of the sector’s intergovernmental systems, thereby optimizing the use of resources and focusing on performance; (c) a menu of technology options and standard guidelines for the construction and rehabilitation of WASH facilities, with special consideration given to water source and environmental protection, water quality standards, gender and disability inclusion, climate adaptation strategies, and the promotion of renewable energy sources, including non-carbon-based solutions; (d) a menu of innovative WASH facility management modalities aside from standard community-based management; and (e) program coordination capacities, including credible verification agency (CVA) management.
- **Strengthening national WASH structures critical to Program delivery.** This component will additionally support key national institutions critical to the strategic direction and oversight of the national program, including the national secretariats of the NAP, PEWASH, and Clean Nigeria: Use the Toilet campaign.
- **Development of National WASH Management Information System (MIS).** This component will support the design, development, and implementation of a national harmonized information system at all levels of government that supports integrated monitoring, reporting, and evaluation of WASH infrastructure, management modalities, and programs. This system will be tailored explicitly to inform decision-making in policy formulation, planning, and resource allocation in the WASH sector, and will build upon existing systems where feasible.
- **Technical, Environmental, Social, and Fiduciary Systems Capacity Building within Sector Agencies.** The Technical Assessment, the ESSA, and the Fiduciary Systems Assessment (FSA) carried out by the World Bank have identified a number of institutional and capacity gaps in federal, state, and local-level sector institutions that will be addressed through the Program’s IPF financing window. While Program states will be supported to address immediate institutional and capacity gaps required for Program implementation, support to additional states that meet the eligibility criteria (see Annex 9) will focus on preparing them for future investment.
 - **Technical Capacity Building.** The focus is on building capacities to monitor, ensure quality, and improve and sustain WASH service delivery, and develop master plans and feasibility studies of pipeline projects climate risks, namely water scarcity, droughts, and floods.
 - **E&S Capacity Building of implementing agencies across all tiers of Government: State-level E&S capacity** will be strengthened through this component, including with respect to the policy enabling environment, risk management, funding, and staffing. Capacities of the WASH agencies at all levels will be enhanced to conduct E&S due diligence in a sound manner and undertake sustainable planning and design using E&S instruments. In addition, monitoring capacities will be developed to ensure that the operation of WASH facilities, regardless of type and scale, are managed in accordance with best practice environmental, community and occupational health and safety standards, including especially the management of pollution incidents. E&S risk management supervision strengthening will be conducted in partnership with the SPESSE project.
 - **Fiduciary Systems Capacity Building.** To address the varying capacity and staffing levels at State PIUs and local implementation agencies, this component will support training and capacity building of existing staff and the hiring of qualified and experienced fiduciary staff as required.
- **Capacity building of National Water Resources Institute (NWRI) and academic institutions.** A parastatal of the FMWR, the NWRI delivers trainings and capacity building within the WASH

sector through ongoing education and post-graduate opportunities. Given its critical role, the IPF component will support NWRI and affiliated universities in addressing capacity constraints within Nigeria's WASH sector. Support will address insufficient facilities and equipment, as well as academic and administrative staffing shortages.

- **Engagement of a credible verification agent (CVA).** The IPF will finance the engagement of a CVA throughout the Program period to undertake verification of the achievement of DLIs across the results areas in all Program states. The FMWR is preparing a detailed verification protocol and TOR to engage the CVA using the agreed procurement process and supervise and manage them in line with the POM. The results of the verification exercise as submitted by the CVA and validated by the FMWR will serve as a basis of annual disbursement after the World Bank task team has provided necessary concurrence. The verification procedure for achievement of DLI 1 by the FMWR will be decided upon prior to DM.

1.3 Stakeholder Engagement Plan and Disclosure

This Stakeholder Engagement Plan (SEP) will be disclosed publicly. The objective is to establish a systematic approach for stakeholder engagement, maintain a constructive relationship with stakeholders, consider stakeholders' views, promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. 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 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.

1.4 Stakeholder Engagement within the context of Nigeria Sustainable Rural Water Supply and Sanitation Sector project

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

The project's stakeholder engagement aims at creating a "social licence"¹ and will depend on mutual trust, respect and transparent communication between the Nigeria Sustainable Rural Water Supply and Sanitation Sector project and its stakeholders. It will thereby improve decision-making and environmental 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.

1.5 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;

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

- **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.

1.6 Overall Objectives

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

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

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

1.7 Limitations

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

1.8 Structure of Stakeholder Engagement Plan

The structure of the stakeholder engagement plan is as given under;

- 1.0 Introduction: Provides introduction and brief background to the project and its salient features, the objectives of designing an SEP for the project as well as limitations of the SEP.
- 2.0 Summary of Stakeholder Engagement Regulatory Framework and Standards: Discusses the regulations of the government and World Bank policy which make the formulation of a Stakeholder Engagement Plan mandatory.
- 3.0 Stakeholder Identification and Analysis: Provides the stakeholder identification and analysis for the project, inclusive of the importance of such an analysis, stakeholder profiles and the mapping of their interests and influences

- 4.0 Stakeholder Engagement Plan: Describes the stakeholder engagement process, including the objectives of such an engagement, the methods of consultation, the present status of the engagement, the way forward, the information disclosure process.
- 5.0 Grievance Management: Discusses the Grievance Redress System and Grievance Resolution Framework
- 6.0 Monitoring and Reporting: Discusses on effective continuous engagement and follow-up for the fulfilment of the project components.
- 7.0 Further Consultations

2.0 SUMMARY OF REGULATORY FRAMEWORK AND STANDARDS

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

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.

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 (2) of the Nigerian constitution takes socioeconomic rights of Nigerians into account.

This chapter includes that no citizen should be denied the right to environment, the right to secure an adequate means of livelihood, right to suitable and adequate shelter, the right to suitable and adequate food etc. Section 20 of the constitution also 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 Environmental Impact Assessment (EIA) Act CAP E12, LFN 2004

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

2.1.4 National Orientation Agency (NOA) Act, 1993

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

2.1.5 Water Resources Act, 2004 CAP W2, LFN 2004

The Water Resources Act is targeted at developing and improving the quantity and quality of water resources. Section 5 and 6 provides authority to make pollution prevention plans and regulations for the protection of fisheries, flora and fauna.

2.1.6 River Basins Development Authority Act, CAP R9, LFN 2004

The River Basins Development Authority Act is concerned with the development of water resources for domestic, industrial and other uses, and the control of floods and erosion.

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

3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Stakeholder Identification

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”.

The Nigeria Sustainable Rural Water Supply and Sanitation Sector 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.

In fulfilment of its requirement, the Federal Ministry of Water Resources, through the Federal Project Implementation Unit (FPIU) and some states (Kano, Ondo and Plateau) identified the various stakeholders for the project. This was done in order to understand the stakeholder needs and expectation for engagement, their priorities and objectives in relation to the project and this was and will continue to be used to tailor engagements with these stakeholders. As part of this process it has been critical to identify vulnerable and disadvantages groups such as women, people living with disabilities etc.

3.2 Stakeholder Categorization

For the purposes of effective and tailored engagement, the stakeholders of Nigeria Sustainable Rural Water Supply and Sanitation Sector project can be divided into three core categories:

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

3.2.1 Implementing Agencies

This category of stakeholders encompasses the leading agencies responsible for overseeing the successful implementation of the Nigeria Sustainable Rural Water Supply and Sanitation Sector project. They include the:

- Federal Ministry of Water Resources;
- State Rural Water Supply and Sanitation Agency (RUWASSA);
- Federal Project Implementation Unit (FPIU);
- State Project Implementation Unit (SPIU);

In order to meet best practice approaches, Nigeria Sustainable Rural Water Supply and Sanitation Sector 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.

3.2.2 Project Affected Parties

Project-affected parties under Nigeria Sustainable Rural Water Supply and Sanitation Sector project include those households, communities and small towns that are likely to be impacted² in the project area where water supply, sanitation, and hygiene interventions are to be implemented. 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, and that may require special engagement efforts to ensure their equal representation in the consultation and participation in the program. The vulnerable groups identified by the project include the persons with disabilities, women and girls. Women and girls are considered especially vulnerable as they are the primary household members responsible for providing water for domestic consumption. 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.

The project has identified project-affected parties' interests and roles in the project's design, implementation and decision-making processes. The project activities under this TA (IPF) component are not likely to result in clearance of vegetation, crops etc. However, program activities under the PforR component would include activities such as treatment plants which is likely to affect communal land used for grazing and subsistence farming and smallholder farms and may result in temporary restriction of access to homesteads, businesses and communal lands. Therefore, communication on the timing of works will be a crucial component of minimizing impacts.

3.2.3 Project 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 Water Supply, Sanitation, and Hygiene (WASH) interventions;
- Residents and business entities, and individual entrepreneurs in the area of the project that can benefit from the WASH interventions;
- Local contractors who can support in the delivery of the Nigeria Sustainable Rural Water Supply and Sanitation Sector project;
- Local, state and national level civil societies and non-governmental organizations (NGOs) with

² Actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.

- an interest in WASH;
- Other government ministries and regulatory agencies at state and national levels;
- Nigeria Sustainable Rural Water Supply and Sanitation Sector project employees and contractors; and
- Mass media and associated interest groups, including local, state and national printed and broadcasting media, digital/web-based entities, and their associations.

Local NGOs and initiative/advocacy groups particularly those focusing on WASH sector 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.

Table 2: List of Stakeholders Identified and Potential Involvement

S/No	Stakeholder	Potential Involvement
1	Water, Sanitation and Hygiene Committees (WASHCOMs), WASH Consumers and users	<ul style="list-style-type: none"> • Participate actively in decision-making, planning, implementing, operating, maintaining new and rehabilitated WASH facilities • Own and control water supply and sanitation facilities • Form Water User Groups/WASH Committees (WASHCOMs) • Ensure continued safe access, quality and use of installed facilities • Partially finance construction costs and fully cover O&M costs of WASH facilities • Have full responsibility for operation and maintenance of water and sanitation facilities. • Carry out monitoring of WASH facilities • Collect data and submit reports to local authorities for on-forwarding to LGAs and States
2	LGAs	<ul style="list-style-type: none"> • Prioritize rural communities for WASH improvements • Co-ordinate and supervise WASH work being done in the LGAs • Monitor and report progress • Support communities to plan and budget for community-based WASH projects and facilitate communities to request for assistance • Community mobilization and training for hygiene and sanitation improvements and community management of water supply and sanitation facilities • Partially finance water supply and sanitation development especially for poor communities and for repair of water facilities beyond the financial capacity of users
3	States (SMWR/RUWASSA/STOWSSA)	<ul style="list-style-type: none"> • Policy formulation and planning • Implement WASH projects • Co-ordinate and supervise WASH work being done in the States • Monitor and report progress • Support LGAs to plan and budget for community-based WASH projects • Support LGAs to provide technical support to growth centers and communities, and monitor, report and account for use of funds • Organize required training for Local Councils, as well as Water User Groups if required • Finance water supply and sanitation development
4	State House of Assembly	<ul style="list-style-type: none"> • Enabling Law for the Sector • Smooth Budget passage • Perform Oversight functions
5	National Assembly	<ul style="list-style-type: none"> • Smooth Budget passage • Perform Oversight functions
	Stakeholder	Potential Involvement
6	Religious Leaders	<ul style="list-style-type: none"> • Influence communities

7	Traditional Rulers	<ul style="list-style-type: none"> • Coordination of Community members • Decision makers • Conflict Resolution • Influence access to Land
8	Federal Government (FMWR, FMoE, FMoH, FMWAs, NPHCDA, NWDC, FPIU, FMoFBNP, FMW&H)	<ul style="list-style-type: none"> • Formulating national policy and strategy to guide the integrated planning, management, development, use and conservation of the nation's water resources. • Co-ordinate the WASH Sector and resource inputs of external and in-country support agencies and other key stakeholders • Approve release of consolidated funds based on realistic, adequate- prepared plans and budgets • Create a positive enabling environment • Develop and disseminate all required planning data and information, costing figures, planning and design guidelines, implementation manuals and guides, reporting formats, etc. • Support States to plan and budget for community-based WASH projects • Support States to provide technical support to States, growth centers and communities, and monitor, report and account for use of funds • Organize required training for Local Government, as well as Water User Groups if required • Promote and organize private sector involvement in sub-sector activities • Monitoring and evaluation to ensure quality of results and cost-effective use of resources • Research and development of new technologies and approaches • Value for money and tracking of funds • Provide progress reports and accounts to Federal Government of Nigeria and Development Partners
9	Private sector	<ul style="list-style-type: none"> • Provide good-quality services and goods to clients and customers • Provide consultancy services i.e. socio-economic reviews, hydrogeological studies, designs, construction supervision. • Carry out training and production of promotional materials • Supply of materials, pumps etc. • Repairs and maintenance of water supply facilities • Financing and Management of WASH facilities
10	CBOs	<ul style="list-style-type: none"> • Assist communities financially and/or technically to meet their responsibilities as WASH consumers • Offer support in a manner consistent with FGN's and States' policies and strategies
11	NGOs	<ul style="list-style-type: none"> • Carry out training of and support communities meet their responsibilities as WASH consumers • Carry out socio economic reviews
Stakeholder		Potential Involvement

12	Development Partners	<ul style="list-style-type: none"> • Provide financing (Loans or Grants) • Support government sector reforms including development of policy, strategy and regulatory frameworks • Support intuitional reforms and capacity building at national and sub- national levels
13	Vulnerable Group: Wheel Chair users, Deaf, Blind, IDPs, Widows, Intellectual Disability, Rural Population	<ul style="list-style-type: none"> • Particular attention will be paid to adverse impacts on Vulnerable/ disadvantaged groups who, because of their social position, may be vulnerable to changes brought about by project activities or excluded from project benefits
14	Media/Press	<ul style="list-style-type: none"> • Awareness and Sensitization • Opportunities to report on the achievements on the project • Mobilization of community • Respond to issues relating to the projects
15	Women Group	<ul style="list-style-type: none"> • Primary users hence their involvement in the project • Awareness creation/Sensitization • Consultations • Gender Inclusion
16	Youth Group	<ul style="list-style-type: none"> • Mobilize for project implementation • Skills acquisition/development • Play important role in Operation and Maintenance
17	Project Affected Persons	<ul style="list-style-type: none"> • Participate actively in decision-making, planning, implementing, operating, maintaining new and rehabilitated WASH facilities • Ownership of water supply and sanitation facilities • Operation and maintenance of facility
18	Security (Police, Nigeria Security and Civil Defence corps (NSCDC) etc)	<ul style="list-style-type: none"> • Security and protection of facilities • Mediation and conflict resolution • Resolve problems within Community
19	Landowners	<ul style="list-style-type: none"> • Provide Land for the project • Support resettlement and livelihood restoration plans
20	Contractors	<ul style="list-style-type: none"> • Execution of contracts • Training of community members • Job creation

3.3 Stakeholder Analysis

“Stakeholder Analysis” is the process of identifying the individuals or groups that are likely to affect or be affected by a proposed project, and understanding them according to their impact on the project and the impact the project will have on them. This information is then used to assess the manner in which the interests of the stakeholders should be addressed in the project plan, policy, program, or other action.

The importance of such an analysis lies in the role played by such an understanding in the assessment of the socio-political environment surrounding the project. It allows for the:

- Identification of the interests, concerns and potential risks surrounding the stakeholders, as well as conflicts of interests (if any).
- Identification of relationship between stakeholders that may enable "coalitions" of project sponsorship, ownership and co-operation as well as the mechanisms which may have a role in influencing other stakeholders.
- Identification of key groups/ individuals to be pin- pointed who need to be informed about the project during the execution phase.
- Identification of stakeholders who are likely to have an adverse impact on the project and taking appropriate measures to combat their influence;
- Generation of information essential to the planning, implementation and monitoring of the project; and;
- Development of a framework for participatory planning and implementation of various project activities

A preliminary stakeholder analysis has been conducted during the Stakeholder Engagement Planning workshop of Nigeria Sustainable Rural Water Supply and Sanitation Sector project. The purpose of the analysis and preliminary engagement was to determine and source the opinions of the most powerful stakeholders to help define the project at its preliminary stage. It was also to build an understanding of the stakeholders early on and to ensure they fully grasp and understand the project. The analysis has assessed the perception of the stakeholders regarding the potential changes (negative and positive) to be produced by the project. The project’s stakeholder’s analysis will be done on regular basis with the aim of tracking changes in their attitudes throughout the project cycle.

3.4 Stakeholder Mapping

“Stakeholder mapping” is a process of examining the relative influence that different individuals and groups have over a project as well as the influence of the project over them. The purpose of a stakeholder mapping is to:

- Identify each stakeholder group;
- Study their profile and the nature of the stakes;
Understand each group’s specific issues, concerns as well as expectations from the project that each group retains;
- Gauge their influence on the Project.

On the basis of such an understanding, the stakeholders are categorised into High Influence/Priority, Medium Influence/ Priority and Low Influence/Priority. The stakeholders who are categorized as high influence are those who have a high influence on the project or are likely to be heavily impacted by the project activities and are thus high up on the project proponent’s priority list for engagement and consultation. Similarly, the stakeholders categorized as medium influence are those who have a moderate influence on the project or even though they are to be impacted by the project, it is unlikely to be substantial and is thus neither high nor low in the project proponent’s list for engagement. On the other hand, the stakeholders with low influences are those who have a minimal influence on the decision making.



In the Stakeholder Engagement Planning Workshop of Nigeria Sustainable Rural Water Supply and Sanitation Sector project, stakeholder analysis and prioritization exercise was carried out with stakeholders from various state WASH agencies, LGA WASH Department and WASHCOMs. The FPIU shall continuously classify stakeholders based on: i) their power to influence and their interest on the project, ii) the legitimacy of each stakeholder's relationship with the project, and iii) the urgency of the stakeholder's claim on the project activities, - potential risks and impacts.

Annex 1 and Annex 2 shows pictures of stakeholder engagement and a summary of engagement activities.

Table 3: Stakeholder Mapping

S/N	Stakeholder	Degree of Interest in the Project	Capacity to Influence the Project
1	WASHCOMs, WASH Consumers and users	High	Medium
2	LGAs	High	Medium
3	States (SMWR/RUWASSA/STOWA)	High	High
4	State House of Assembly	Medium	High
5	National Assembly	Medium	High
6	Religious Leaders	Medium	Medium
7	Traditional Rulers	Medium	High
8	Federal Government (FMWR, FMoE, FMoH, FMWAs, NPHCDA, NWDC, FPIU, FMoF, Budget and National Planning)	High	High
9	Private sector	Medium	Medium
10	CBOs	High	Medium
11	NGOs	High	Medium
12	Development Partners	High	High
13	Project Affected Persons	High	Medium
14	Vulnerable Group: Wheel Chair users, Deaf, Blind, IDPs, Widows, Intellectual Disability, rural population	High	Low
15	Media/Press	Medium	High
16	Women Group	High	Low
17	Youth Group	Medium	Medium
18	Principal/Head Teachers of schools and Heads of PHC	High	Medium
19	Landowners	Low	Medium
20	Contractors	High	Medium

4.0 STAKEHOLDER ENGAGEMENT PLAN

The process of engagement and consultation in the project spans the entire lifetime of the project, from inception to its closure. The goal of the project's Stakeholder Engagement Plan is to promote and provide means for effective, inclusive, accessible and, meaningful engagement with project- affected parties throughout the project life -cycle on issues that could potentially affect their livelihoods and properties.

While advancing effective, inclusive and, meaningful engagement with project- affected parties, the FPIU shall conduct consultations that will ensure two-way communication processes. The objective of the engagement and consultations plan under the project is to:

- a) Begin early in the project planning process to 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 Nigeria Sustainable Rural Water Supply and Sanitation Sector project.

Table 4: Stakeholder Engagement Plan Framework

S/No	Stakeholder	Concerns/Issues	Roles & Responsibilities
1	WASHCOMs, WASH Consumers and users	<ul style="list-style-type: none"> • Inadequate technical and financial capacity in the management of WASH facilities • Communities not taking ownership of projects/WASH facilities delivered 	<ul style="list-style-type: none"> • Own and control water supply and sanitation facilities • Ensure continued safe access, quality and use of installed facilities • Partially finance construction costs and fully cover O&M costs of WASH facilities • Have full responsibility for operation and maintenance of water and sanitation facilities.
2	LGAs	<ul style="list-style-type: none"> • Inadequate logistics support, tools and equipment to support effective coordination and supervision of WASH works • Limited investment in WASH by the Local Governments due to control of LGA resources by the State Government 	<ul style="list-style-type: none"> • Co-ordinate and supervise WASH work being done in the LGAs • Monitor and report progress • Community mobilization and training for hygiene and sanitation improvements and community management of water supply and sanitation facilities • Partially finance water supply and sanitation development especially for poor communities and for repair of water facilities beyond the financial capacity of users
3	States (SMWR/RUWASSA/STOWA)	<ul style="list-style-type: none"> • Frequent deployment of State and LGA officials. • Inadequate budget provision and non-release of budgetary allocation. • Inadequate logistics support, tools and equipment to support effective coordination and supervision of WASH works. 	<ul style="list-style-type: none"> • Policy formulation and planning • Implement WASH projects • Co-ordinate and supervise WASH work being done in the States • Monitor and report progress • Support LGAs to plan and budget for community-based WASH projects
4	State House of Assembly	<ul style="list-style-type: none"> • Delay in passage of relevant laws for effective delivery in the WASH sector • Inadequate budgetary allocation to the WASH sector. 	<ul style="list-style-type: none"> • Enabling Law for the Sector • Smooth Budget passage • Perform Oversight functions
5	National Assembly	<ul style="list-style-type: none"> • Delay in passage of relevant laws for effective delivery in the WASH sector • Inadequate budgetary allocation to the WASH sector. 	<ul style="list-style-type: none"> • Enabling Law for the Sector • Smooth Budget passage • Perform Oversight functions

6	Religious Leaders	<ul style="list-style-type: none"> Religious beliefs and doctrines may conflict with project delivery strategy 	<ul style="list-style-type: none"> Influence the opinion of the community members Coordination of community members
---	-------------------	---	---

S/No	Stakeholder	Concerns/Issues	Roles & Responsibilities
7	Traditional Rulers	<ul style="list-style-type: none"> The concern can be in impact of the project on the cultural beliefs in the community 	<ul style="list-style-type: none"> Coordination of community members Decision makers Conflict Resolution
8	Federal Government (FMWR, FMoE, FMoH, FMWAs, NPHCDA, NWDC, FPIU, FMoF, Budget and National Planning)	<ul style="list-style-type: none"> The concern is that the project complies with national policies, guidelines and regulatory requirements. 	<ul style="list-style-type: none"> Formulating national policy and strategy to guide implementation of project Co-ordinate the WASH Sector and resource inputs of external and in-country support agencies and other key stakeholders Approve release of consolidated funds based on realistic, adequate- prepared plans and budgets Create a positive enabling environment Support States to provide technical support to States, growth centres and communities, and monitor, report and account for use of funds
9	Private sector	<ul style="list-style-type: none"> Poor utilization of private sector expertise and experience in the sustainable delivery of WASH projects Non-compliance with regulatory standards 	<ul style="list-style-type: none"> Financing and Management of WASH facilities Repairs and maintenance of water supply facilities
10	CBOs	<ul style="list-style-type: none"> Capacity of the CBO to provide adequate and sustainable support to the community 	<ul style="list-style-type: none"> Assist communities to meet their responsibilities as WASH consumers Community mobilization, advocacy and sensitization
11	NGOs	<ul style="list-style-type: none"> Capacity of the NGO to provide trainings as required to the community 	<ul style="list-style-type: none"> Carry out training of and support communities meet their responsibilities as WASH consumers Carry out socio economic reviews Advocacy and sensitization Support to Communities and Local governments in a manner consistent with FGN's and States' policies and strategies
12	Development Partners	<ul style="list-style-type: none"> Non-compliance to Development Partners 	<ul style="list-style-type: none"> Provide financing (Loans or Grants) Support government sector reforms including

		<p>policies (e.g. World Bank policies) in project delivery</p> <ul style="list-style-type: none"> • The concern of not financing the project when there is a breach in agreement. 	<p>development of policy, strategy and regulatory frameworks</p> <ul style="list-style-type: none"> • Support intuitional reforms and capacity building at national and sub- national levels
13	Project Affected Persons	<ul style="list-style-type: none"> • Project Affected person's acceptance and taking ownership of the project 	<ul style="list-style-type: none"> • Participate actively in decision-making, planning, implementing, operating, maintaining new and rehabilitated WASH facilities • Ownership of water supply and sanitation facilities • Operation and maintenance of facility
S/No	Stakeholder	Concerns/Issues	Roles & Responsibilities
14	Vulnerable Group: Wheel Chair users, Deaf, Blind, IDPs, Widows, Intellectual Disability, rural population	<ul style="list-style-type: none"> • Vulnerable groups are community members likely to be affected by the project but may have difficulty in engaging with the stakeholder consultation process and thus may not be able to fully express their concerns regarding the proposed Project. 	<ul style="list-style-type: none"> • Particular attention will be paid to adverse impacts on Vulnerable/ disadvantaged groups who, because of their social position, may be vulnerable to changes brought about by project activities or excluded from project benefits
15	Media/Press	<ul style="list-style-type: none"> • The media/press can influence the social license of the project held by the project affected communities 	<ul style="list-style-type: none"> • Awareness and Sensitization • Report on the projects and other development • Mobilization of community • Respond to issues relating to the projects
16	Women Group	<ul style="list-style-type: none"> • Culturally, in most communities women opinion are likely to be played down during consultation, though they are the primary users of WASH facilities • Universal access designs of WASH facilities that takes into consideration gender inclusion 	<ul style="list-style-type: none"> • Primary users of WASH facilities • Awareness creation/Sensitization • Consultations
17	Youth Group	<ul style="list-style-type: none"> • Ownership of the project • Availability of skilled persons to support operation and maintenance of WASH facilities 	<ul style="list-style-type: none"> • Mobilize for project implementation • Skills acquisition/development • Play important role in Operation and Maintenance
18	Principal/Head Teachers of	<ul style="list-style-type: none"> • Ownership of WASH facilities provided in 	<ul style="list-style-type: none"> • Ownership, operation and maintenance water

	Schools and Heads of PHC	<p>schools and Primary Health Centres</p> <ul style="list-style-type: none"> • Capacity to operate and maintain WASH facilities provided 	<p>supply and sanitation facilities</p> <ul style="list-style-type: none"> • Sensitization and awareness creation
19	Landowners	<ul style="list-style-type: none"> • Loss of Land due to land acquisition for the project, compensation and resettlement • Impact of the project on the livelihood of land users 	<ul style="list-style-type: none"> • Provide Land for the project • Support resettlement and livelihood restoration plans
20	Contractors	<ul style="list-style-type: none"> • Non-Compliance to Environmental and Social consideration • Non-Compliance to contract standards and specification • Disagreement with beneficiary community/project affected persons 	<ul style="list-style-type: none"> • Execution of contracts • Training of community members • Job creation

4.1 Summary of Stakeholder Consultations to Date

4.1.1 National Stakeholder's Consultation Workshop on Nigeria Sustainable Rural Water Supply and Sanitation Sector project



The 1st National Stakeholder's Consultation Workshop on Nigeria Sustainable Rural Water Supply and Sanitation Sector project was organized by Federal Ministry of Water Resources (FMWR) in collaboration with the World Bank was held from 12th -13th September 2019 at Nicon Luxury Hotel, Abuja. The consultation workshop was to review and recommend modalities necessary for successful take-off and implementation of the proposed project in view of the \$350million lending portfolio by

the World Bank to support rural communities and small towns across the country.

The workshop brought together over 201 (Two Hundred and One) participants comprising Honorable Commissioners/Permanent Secretaries of State Ministries of Water Resources, Directors of Federal and State Ministries of Water Resources, General Managers/Managing Directors of State Rural Water Supply and Sanitation Agencies (RUWASSAs), other MDAs as well as Development Partners, Civil Society Organizations, related sector experts and other stakeholders.

The following resolutions were agreed upon to be adopted for the proposed Rural WASH project:

- i. The proposed project development objective and components were accepted to include construction of WASH facilities, Technical Assistance and Emergency Component;
- ii. The workshop agreed that the implementation of the proposed project shall derive from PEWASH protocols and guidelines;
- iii. It was agreed that LGA- wide approach shall be adopted and WASH services should be mainstreamed across institutions, including schools and healthcare facilities;
- iv. Project implementation shall be by both the Federal and States using project implementation units and steering committees;
- v. It was agreed that the project should adopt the approach of having state eligibility criteria, state readiness criteria and prioritization criteria for selection of States and Project LGAs;
- vi. The workshop agreed that Federal, States and LGAs shall make contributions towards implementation of the project and that financial commitment of the States shall be a readiness criterion;
- vii. The Monitoring and Evaluation system available for the monitoring of Rural WASH in the country is inadequate and shall be upgraded using a comprehensive sector-wide and country-led MIS system;
- viii. The workshop appreciated the World Bank and their team for the support towards the preparation of the proposed project.

4.1.2 Stakeholder Engagement Planning Workshop

The stakeholder engagement planning workshop was held on the 20th November, 2019 organized by the FMWR through the FPIU with support from World Bank, which included stakeholders from various state WASH agencies, LGA WASH Department and WASHCOMs from Plateau, Ondo, and Kano states. The workshop was to enhance capacity in stakeholder engagement for project design and support the FPIU in formulating a Stakeholder Engagement Plan (SEP) in line



with the Environmental and Social Framework (ESF) requirements.

4.2 Engagement Methods and Tools

There are a variety of engagement techniques that shall be used to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to 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 the method of liaising with the local communities (e.g. focus group discussions, displays and visuals with a lesser emphasis on technical aspects).

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

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

When selecting an appropriate consultation technique, culturally appropriate consultation methods, and the purpose for engaging with a stakeholder group shall be considered. The technique mostly considered in projects are:

Table 5: Stakeholder Engagement Techniques

S/N	Engagement Technique	Appropriate application of the technique
1	Correspondences (Phone, Emails)	Distribute information to Government officials, NGOs, Local Government, and organisations/agencies Invite stakeholders to meetings and follow-up
2	One-on-one meetings	Seeking views and opinions Enable stakeholder to speak freely about sensitive issues Build personal relationships Record meetings
3	Formal meetings	Present the Project information to a group of stakeholders Allow group to comment – opinions and views Build impersonal relation with high level stakeholders Disseminate technical information Record discussions
4	Public meetings/Workshops	Present Project information to a large group of stakeholders, especially communities Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc. Record discussions, comments, questions.
5	Focus group meetings	Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline

		information Build relationships with communities Record responses
6	Project website	Present project information and progress updates Disclose ESIA, ESMP, RPF and other relevant project documentation
7	Direct communication with affected landowners	Agree on options for land acquisition.
8	Project leaflet	Brief project information to provide regular update Site specific project information.

Table 6: 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 NGSRWSSP project. 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.	<ul style="list-style-type: none"> ▪ 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.	<p>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.</p> <p>Means of distribution – post, emailing, electronic subscription, delivery in person.</p> <p>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.</p>	<ul style="list-style-type: none"> ▪ All projected affected parties ▪ All project interested parties ▪ Implementing Agencies ▪ Government Ministries, Departments and Agencies
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, state and national printed media, including those intended for general reader and specialised audience	<ul style="list-style-type: none"> ▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
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.	<ul style="list-style-type: none"> ▪ 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. Disclose ESIA, ESMP, RPF and other relevant project documentation	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	<ul style="list-style-type: none"> ▪ 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.	<ul style="list-style-type: none"> ▪ All projected affected parties ▪ All project interested parties ▪ Other potential stakeholders
• 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.	<ul style="list-style-type: none"> ▪ All projected affected parties

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
Dedicated telephone line (hotline)	<p>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.</p> <p>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.</p>	Any issues that are of interest or concern to the direct project beneficiaries and other stakeholders.	<p>Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings.</p> <p>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.</p>	<ul style="list-style-type: none"> ▪ Any project stakeholder and interested parties.
Internet/Digital Media	<p>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.</p> <p>Web-site should have a built-in feature that allows viewers to leave comments or ask questions about the Project.</p> <p>Website should be</p>	Information about Project operator and shareholders, Project development updates, employment and procurement, environmental and social aspects.	<p>A link to the Project website should be specified on the printed materials distributed to stakeholders.</p> <p>Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc.</p> <p>Limitation: Not all parties/stakeholders have access to the internet, especially in the remote areas and in communities.</p>	<ul style="list-style-type: none"> ▪ Project stakeholders and other interested parties that have access to the internet resources.

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
	available in English			
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.	<ul style="list-style-type: none"> ▪ 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.	<ul style="list-style-type: none"> ▪ Project affected parties, especially vulnerable groups.
• Consultation & Participation				
Public hearings	Project representatives, the affected public, authorities, 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	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	Wide and prior announcement of the public hearing and the 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	<ul style="list-style-type: none"> ▪ Project affected parties ▪ Relevant government Ministries Departments and Agencies. ▪ NGOs and civil societies ▪ Other interested parties

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups
	statutory expert review.		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.	
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.	<ul style="list-style-type: none"> ▪ All project affected parties especially vulnerable groups; ▪ Project delivery agencies ▪ NGRWSSSP 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 to queries or provide clarifications.	Project-related materials. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the info centre or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.	<ul style="list-style-type: none"> ▪ All project affected parties ▪ Project interests' parties ▪ Other potential stakeholders

4.3 Description of Disclosure Methods

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

- Federal Ministry of Water Resources;
- State Rural Water Supply and Sanitation Agency (RUWASSA);
- Federal Project Implementation Unit (FPIU); The Ministries under the Technical Working Group;
- State Project Implementation Unit (SPIU); 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 website 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, state and national NGOs, relevant professional bodies as well as other interested parties.

Table 7: 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 website. 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	Stakeholder Engagement Plan;	Public Notices

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
Agencies	Regular updates on Project development; Additional types of Project's information if required for the purposes of implementation and timeline.	Consultation Meetings Information leaflets and brochures.
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 website. 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

Grievance refers to any discontent or dissatisfaction or feeling of injustice that adversely affects organizational relations or productivity. The dissatisfaction amongst others could be as a result of poor service delivery, wages/working conditions, employment relation etc. Grievance may sometimes be expressed and sometimes not. Even sometimes, it may not be valid also. When grievances, generally, minor ones are not expressed by the victim(s) they just accumulate and lead to major conflicts. Therefore, proper administration of grievance and grievance handling is necessary in any organization or system as unattended grievances may lead to frustration, low productivity, and feeling of discontent amongst others.

A grievance in the case of the NGSRWSSSP can be a concern or complain of dissatisfaction or feeling raised by an individual or a group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by activities of the project components if not addressed effectively, may pose a risk

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 agencies 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)

The Project-Affected-People in rural areas and small town settlements and any other stakeholders may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). The overall objectives of the GRM are to:

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

The GRM will be accessible to all external project stakeholders, including affected people, community members in rural areas and small towns, civil society, media, and other interested parties. Grievances may emerge from directed and indirect activities related to Component 1 civil work activities. Local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms. Workers' related grievances mechanisms are to be addressed in the Labour Management Procedure (LMP) and Resettlement related grievance shall be addressed in the Resettlement Policy framework (RPF).

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 agencies. 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. All grievance that cannot be resolved at thereafter 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 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 after the date a complaint is submitted, the responsible person within the unit will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. The information provided to complainant would also include, if required, the likely procedure if complaints had to be escalated outside the unit and the estimated timeline for each stage.
- Step 4: Verification, investigation and action. This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.
- Step 5: Monitoring and evaluation. Monitoring refers to the process of tracking grievances and assessing the progression toward resolution. Each implementing agency would develop and maintaining a grievance register and maintain records of all steps taken to resolve grievances or otherwise respond to feedback and questions.
- Step 6: Providing Feedback. This step involves informing those who have raised complaints, concerns or grievances the resolutions to the issues they have raised. Whenever possible, complainants should be informed of the proposed resolution in person, which gives them the opportunity ask follow-up questions which could be answered on the spot for total resolve. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the World Bank, as described in 5.6, or through a court of competent jurisdiction.

5.3 Grievance Escalation Process

- GRM Stage One – Water, Sanitation and Hygiene Committee (WASHCOM) Level Resolve

This stage would consist of grievances collection points at the WASHCOM. As stated in the six-step 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. The WASHCOM would attempt a full resolve of grievances at this stage as much as practical to the satisfaction of all parties involved. Should the complainant not be satisfied at stage one, the grievances shall be escalated to stage two.

- GRM Stage Two – Local Government Area (LGA) Level Resolve

The stage two level grievance resolve will be at the LGA WASH Department. Once received, sorted and processed grievances 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 State (SPIU/RUWASSA).

- GRM Stage Three – State (SPIU/RUWASSA) Level Resolve

The State (SPIU/RUWASSA) Level Resolve shall have a social specialist in the SPIU responsible for resolving all grievances escalated to it. The social specialists shall update the grievance dashboard which shall be the compendium of all grievances raised across GRM State One and GRM Stage Two levels.

- GRM Stage Four – Federal (FPIU/FMWR) Level Resolve

This stage will be at the Federal (FPIU/FMWR) Level, which shall have a social specialist responsible for resolving all grievances escalated to it. The social specialists shall meet quarterly to review the grievance registers maintained by the state RUWASSA/SPIU and update the grievance dashboard which shall be the compendium of all grievances raised during project implementation.

5.4 Grievance logs

Each implementing agency shall establish a grievance uptake point. The grievance log should have the following.

- 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

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

5.6 Point 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 project implementation Unit office. The point of contact regarding the stakeholder engagement program is shown in the box below.

Organization:	Federal Ministry of Water Resources
Description:	Contact details
Name and position:	Engr. Abdulhamid Gwaram, Project Coordinator
Address:	Department of Water Supply, Old Federal Secretariat, Block A, Area 1-Garki, Abuja
E-mail:	a_gwaram@yahoo.com
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

Monitoring and Tracking of Stakeholder Engagement is important as it ensures effective continuous engagement and follow-up, as well as minimizes slippages and oversight of important engagements. 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:

- 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;
- 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; and
- Number of press materials published/broadcasted in the local, state, and national media.

7.0 Further consultations

Further Consultations will be carried out as outlined in the environmental and social commitment plan (ESCP) developed for this project.

8.0 REFERENCES

<https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

<http://documents.worldbank.org/curated/en/226841560839938737/Stakeholder-Engagement-Plan-SEP-Kingdom-of-Eswatini-Water-Supply-and-Sanitation-Access-Project-P166697>

<http://documents.worldbank.org/curated/en/815391571261159490/Stakeholder-Engagement-Plan-SEP-Sustainable-Procurement-Environmental-and-Social-Standards-Enhancement-Project-SPESSSE-P169405>

Stakeholder Engagement Plan (2013). Guma Mines, Chhattisgarh, India (Reference I8859)

Stakeholder Engagement Plan (2014). Portucel Mozambique (project no. 32522)

ANNEX I: PICTORIALS



Presentation by NGSRWSSSP Project Coordinator at the Stakeholders Engagement Plan Workshop



Participants at the Stakeholders Engagement Plan Workshop



Participants interacting at the Stakeholders Engagement Plan Workshop



Participants carrying out group exercise



Group Exercise on Stakeholder mapping and profiling



Group Exercise on Stakeholder mapping and profiling

NWRI

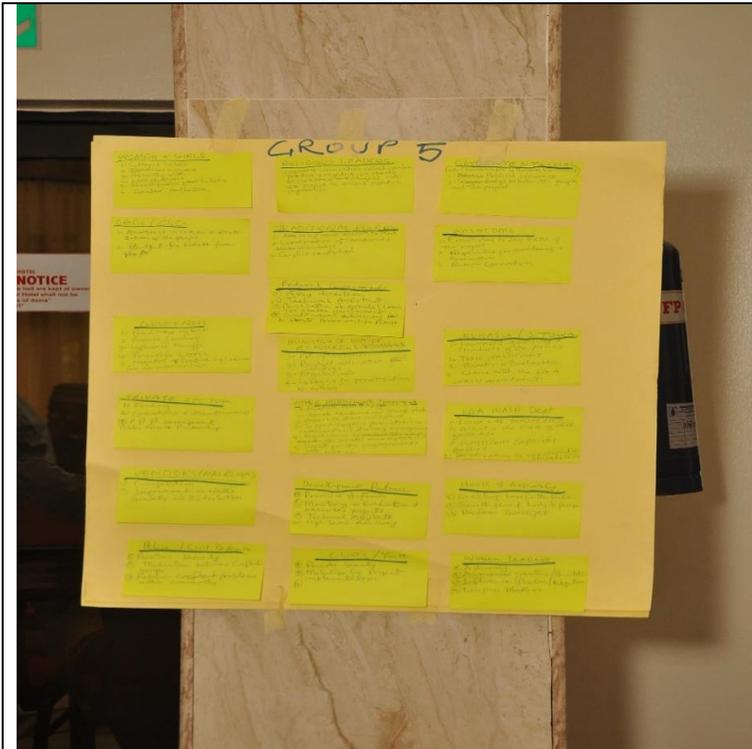
Stakeholder Engagement Plan Framework

Stakeholder	Issues	Roles & Responsibilities	Notes
Youth		STATE & L.G.A SPIU/RUMPA, Warcon	
WASCON		RUMASSA, LGA	
PROTECTED ORGANIZATION TRADITIONAL LEADERS POLITICIANS		RUMASSA, LGA WASCON, RUMASSA, LGA WASCON, WASCON, RUMASSA, LGA	

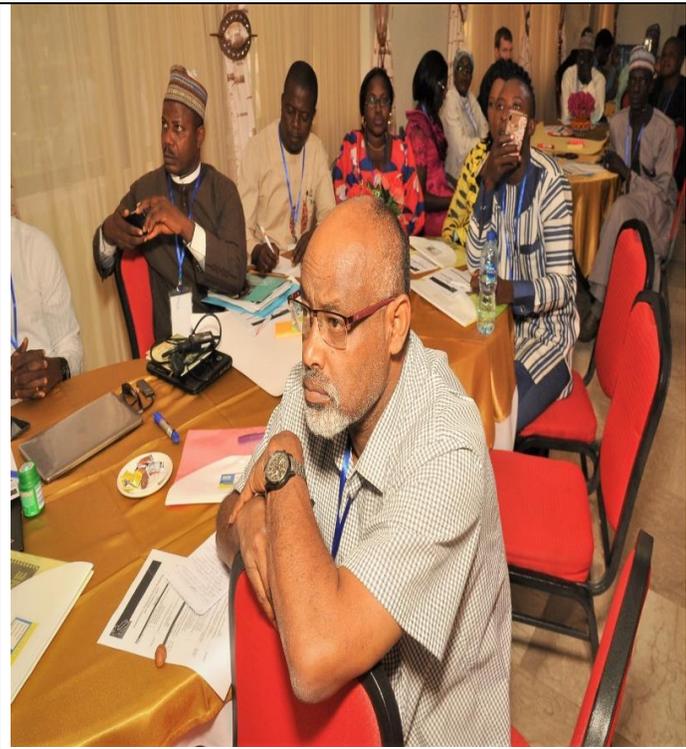
Developing Stakeholder Engagement Plan Framework during the workshop



Group Exercise on Stakeholder mapping and profiling



Group Exercise on Stakeholder mapping and profiling



Section of participants at the Stakeholder Engagement Plan workshop



Resource Person from the World Bank during the Workshop



Participants at the Workshop



Resource Persons from the World Bank at the workshop



Group photograph of participants at the workshop

ANNEX 2: SUMMARY OF STAKEHOLDER CONSULTATIONS

S/No	Consultation	Meeting Dates	Meeting Notes	Venue
1	PEWASH FPIU with WB Team, FPIU and Ministry of Water Resources	20- 28 June, 2019	<ul style="list-style-type: none"> • First WB Mission • Preparation process • Identification Mission 	Conference Room of Ur3, Wuse 2
2	PEWASH FPIU with WB Team, FPIU and WR with all line Ministries	2 nd – 10 th September, 2019	<p>2nd WB Mission took place with various Consultation meetings with line Ministries like</p> <ul style="list-style-type: none"> • Primary healthcare (NPHCDA), • Women Development Centres • MoE • NASHIMS & NAWIS 	Meeting with PIU in STWSSP office. Before courtesy visits to line ministries.
3	1 st National Stakeholders Consultation Workshop on Nigeria Rural WASH Project	12 th – 13 th September, 2019	The Consultations was with all stakeholders from the urban, rural and small towns. The meeting was to exchange information with all the various stakeholders. The objective was to obtain feedback on the analysis, design features of the project, implementation and other decisions.	Nicon Luxury Hotel, Abuja
4	Meeting with the Environmental Safeguard Consultant from WB Washington, Dr. Philip Oke	30 th September, 2019	Interaction with the FPIU - Mamdam	WB office, Abuja
5	ESF Implementation Capacity Assessment at the Federal Ministry of Water Resources.	3 rd October, 2019	<p>2 days Interactive sessions with Dr. Bankole and Mr. Philip Oke</p> <ul style="list-style-type: none"> • to understand the tenets associated with ESF, • Need for new frameworks and MP as Labour, Gender, Grievance and SEP are very important, • Need for community health and safety, • Case study of Tanzania rail was given 	WB office, Abuja
3	ESF Implementation Capacity Assessment at the State Level (Kano & Ogun States)	7 th & 8 th October, 2019	<p>Consultation with Kano and Ogun held the PS and all his Directors for urban, rural and small towns, including the State PEWASH team, Dr. Bankole and FPIU for/to</p> <ul style="list-style-type: none"> • Program screening • Baseline and EIA impact assessment 	Conference Room in the State Ministry of Water Resources of Kano and Ogun State respectively.

			<ul style="list-style-type: none"> • Discussed issues of operational principles (OPS) now ESF • Need for impact assessment • Need to develop frameworks to take care of E&S issues • Institutional structures and capacities that are inherent in their urban, rural and small towns • Visit to WASHCOM community at Danwaki LGA in Kano 	
4	Stakeholder Engagement Plan Workshop on Nigeria Rural WASH Project	11 th – 21 st November, 2019 20 th November, 2019 for the SEP workshop	3 rd WB Mission to further support in planning a sustainable WASH program as part of the National Stakeholders’ Consultative Workshop with Ms. Sunrita, Dr. Bankole, FPIU and State Focal persons in attendance to <ul style="list-style-type: none"> • Bring some stakeholders together in a participatory workshop • Build confidence of State-LGAs Stakeholders through advocacy • Focal group discussion to gather initial views on the program and • Inform designs of the SEP 	Reiz Continental Hotel, CBD, Abuja.
5	SURWASH ESSA Consultations with states (Kaduna, Gombe, Delta, Imo, Katsina, Ekiti and Plateau)	Nov. – Dec. 2020	Discussions on state selections under Tier 1 and DLIs <ul style="list-style-type: none"> • Clarity of program design and financing options • Discussion on Project Environmental Social Systems Assessment • Policies and plans • Implementation procedure • Track record of system assessment to understand the environmental and social systems of the state and implementing agency • Request for documentation on environmental and social systems at the state level • Project design and implementation priorities 	Virtual Meetings/Consultations with the States
6	SURWASH Technical	Nov. – Dec. 2020	Discussions on state selections under Tier 1 and DLIs	Virtual Meetings/

	Consultations with states (Kaduna, Gombe, Delta, Imo, Katsina, Ekiti and Plateau)		<ul style="list-style-type: none"> • Project design • State selection of projects under Tier 1 and DLIs • Project costing priority areas • Implementation parties • Technical specification on experience in design, implementation and management of Water and Sanitation projects and WASHCOMs 	Consultations with the States
7	Follow-up discussions with states teams on state priorities and PEF (Kaduna, Gombe, Delta, Imo, Katsina, Ekiti and Plateau)	January, 2021	<p>Feedback discussions on:</p> <ul style="list-style-type: none"> • Technical aspects • Environmental and Social aspects • Fiduciary aspects • Project implementation • Clarification of high risk project parameters • Understanding project approach, design and rationale for investment plan. • Follow up on ESSA and technical consultations 	Virtual Meetings/ Consultations with the States