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# STAKEHOLDER ENGAGEMENT PLAN

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National Social Safety Net Program – Scale Up (P176935)



October 1, 2021

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## 1. Introduction/Project Description

The World Bank is supporting the Federal Government of Nigeria to implement the National Social Safety Nets Project (NASSP) (P151488) to help reduce extreme poverty. The development objective of NASSP (P151488) is to provide access to targeted transfers to poor and vulnerable households under an expanded national social safety nets system. NASSP has two components:

- i) To establish the foundation for a National Social Safety Net System to strengthen and consolidate the building blocks of a safety net system at the national and state level that can deliver targeted support to poor households across Nigeria; and
- ii) Implementing a targeted cash transfer to poor and vulnerable households included in the NSR, delivering regular and reliable transfers in a way that is accessible to beneficiaries and with benefit levels that are consistent with the project objectives.

The framework of the NASSP project application has been carried out from inception in 2016 to date at a reasonable pace, until COVID-19 pandemic emerged, and it became apparent that there was the need to fast-track implementation to respond to the socio-economic shocks of the pandemic. The project was faced with two specific challenges: (a) using geographic targeting meant that the database of the poor and vulnerable households in the national social register (NSR) was largely rural; (b) urban poor informal workers were largely left out. The project application was therefore adapted to achieve both horizontal and vertical expansion of the interventions. This was done by modifying the community-based targeting process to fast-track the geographic coverage across rural and urban locations (horizontal expansion); as well as pay attention to the emerging urban poor, and populations at risk of falling into poverty (vertical expansion).

NASSP emerged into the fifth and final year of intervention, with an extremely dynamic context of socio-economic shocks heralded by COVID-19. This has necessitated a redefined agreement between the Government of Nigeria and the World Bank to undertake the Scale-Up of NASSP (NASSP-SU), which will represent the second phase of the NASSP.

### NASSP Scale-Up (NASSP-SU)

The proposed NASSP Scale Up (NASSP SU) will complement the government plan by providing financial resources and technical support for the delivery of temporary cash transfer support to the population affected by shocks, to protect the livelihoods of the existing chronically poor households as well as by strengthening the shock responsive national social protection system.

The overall objective of the NASSP SU is to expand coverage of shock responsive safety net support among the poor and vulnerable and strengthen the national safety net delivery system. Gender and citizen engagement are important dimensions of the results to be achieved by the project. These will be monitored through the outcome indicators listed above as well as intermediate indicators looking at specific aspects of gender and citizen engagement.

The project is designed to:

- deliver short-term cash transfer support for six (6) months for newly targeted urban and rural vulnerable households and extend support duration for existing NASSP; and beneficiaries.
- finance the development and strengthening of the National Social Safety Net delivery system and institutional support.
- use the current NASSP delivery mechanism and institutional structure for the NASSP-SU.

The project builds on the NASSP to provide strengthened social assistance support to Nigerian citizens and will support the following components:

- Component 1. Economic Shock Responsive Cash Transfer (ESR-CT). US\$476 million; This component will provide temporary cash transfer to eligible beneficiaries in response to the current economic shocks affecting the country. The component has two subcomponents: i) *Subcomponent 1.1. Rural ESR-CT to eligible beneficiaries in the NSR*, ii) *Subcomponent 1.2. Urban ESR-CT to eligible beneficiaries through the expansion of the RRR*.
- Component 2. Extended Regular Cash Transfer (ER-CT) for the poor and the vulnerable. US\$ 294 million: This component will continue to provide social assistance to the poor and vulnerable under NASSP by extending the duration of the transfers to the same households and, as feasible, combining it with a package of support services to improve their livelihood. The beneficiaries under this component will be the current beneficiaries of the regular-CT program under NASSP
- Component 3. Delivery System Strengthening and Program management. US\$ 30 million. Component 3 will expand and strengthen the social assistance/safety nets delivery systems through increased integration and use of digital technologies at various stages of the delivery chain and provide project management support. The Component will support two subcomponents: i) *Subcomponent 3.1. Expansion and strengthening of the safety nets delivery systems through increased integration and the use of digital technologies*, ii) *Subcomponent 3.2. Project management support*.

In addition to the three-components discussed above, the project will also support: a) citizen engagement and social accountability, b) gender and social inclusion, and c) climate co-benefit. The primary beneficiaries of the project will be the cash transfer beneficiaries. In addition to cash transfer beneficiaries, the project will improve the delivery systems for social assistance programs – both current and future.

The project has coverage across the whole country, involving the 36 States of the federation and the Federal Capital Territory. Additional information on the NASSP intervention can be accessed from the NASSP website: <http://www.nassp.gov.ng>

## **2. Brief Summary of Previous Stakeholder Engagement Activities**

Consultations during the NASSP-SU preparation phase were limited to relevant government officials. This Stakeholder Engagement Plan as well as the proposed Generic Environmental and Social Management Plan (ESMP) that will be prepared under the NASSP-SU will be consulted on and disclosed throughout project implementation. The NASSP-SU includes considerable resources to implement the actions included in the SEP. A more detailed account of these actions will be prepared as part of the update of this SEP, which is expected to take place within 30 days after the NASSP-SU effectiveness date. The SEP will be continuously updated throughout the NASSP-SU implementation period, as required.

Nonetheless, the SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure, to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and to ensure that these groups are provided sufficient opportunity to voice their opinions and concerns, which may influence Project decisions. The World Bank's Environmental and Social Standards (ESS) 10 on Stakeholder Engagement and Information Disclosure recognizes the importance of a systematic approach

to open and transparent engagement between the project proponent and project stakeholders as an essential element of good international practice.

For the National Social Safety-Nets Project Scale-Up and its sub-project activities in the participating states, there is need for open and inclusive engagements/dialogues with stakeholders affected or likely to be affected by the project (project affected parties), and other interested parties throughout the project lifecycle as required by ESS 10, and as has been implemented under the NASSP guided by the principle of Community Engagement and Social Accountability.

This SEP is designed to fulfil the project's requirements as stated in ESS10 of the ESF. Its goal is to promote and support inclusive and transparent participation of all stakeholders in the design and implementation of the NASSP-SU. Where properly designed and implemented, stakeholder engagement supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts. NASSP-SU will maintain this principled process, as was done with NASSP.

In line with this, a pre-appraisal mission was conducted from September 20 – 24, 2021. The mission included the World Bank Team and the Federal Government represented by; the Federal Ministry of Humanitarian Affairs, Disaster Management, and Social Development (FMHADMSD), Federal Ministry of Finance, Budget and National Planning (MFBNP); the department of IERD; National Social Safety Nets Project Team; State representative including the State Operations Coordinating Unit, and the State Cash Transfer Units, and other Stakeholders.

### 3. Stakeholder identification and analysis

The stakeholder analysis for this SEP identifies the individuals or groups that are likely to be impacted by Project activities, based on the significance of the impact/influence as well as interested parties who have direct and indirect interest on the project. This information is then used to formulate the SEP and assess the way the interests of the stakeholders should be addressed during the Project lifecycle.

The stakeholders of the NASSP-SU range from the direct beneficiaries—poor and vulnerable households and those in their communities—to policy makers, participating State Government MDAs, Federal Government MDAs, development partners, civil society organizations, vulnerable groups and the media. The primary stakeholders play core roles in the project as well as the secondary stakeholders with differences in the level of impact of the project on each of them. Project stakeholders can further be categorized as primary, secondary and tertiary 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”.

- **Tertiary/Key Stakeholders:** These are usually “external” who are not necessarily directly involved with the project, but whose even peripheral actions (or inactions) may positively or negatively or tangentially impact on the project and its outcomes. These include policy makers, civil society, government entities, media, etc.

The level of involvement by the different stakeholders also forms a basis for classification. This has to do with the level of interest of the stakeholders with regards to the expected outcomes of the project and how much the project team wants them to participate for practical reasons. The NASSP-SU stakeholders are defined as individuals, groups or other entities who:

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

### 3.1. Affected parties

Affected parties in all participating States who are directly affected by project activities would be closely engaged in identifying risks and mitigation measures as well as in decision-making . The directly affected parties include but are not limited to:

- Vulnerable people and populations;
- Local community members who are benefitting from the cash transfer interventions;
- Community workers (men and women); community designated nominees supporting and facilitating outreach activities
- Contracted contractors, employees, consultants, etc.;
- Field Staff directly involved in supervisions and monitoring;
- Local NGOs/CSOs involved or interested in the project outcomes;
- Financial Institutions involved with payment system and delivery;

### 3.2. Other 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 interventions;
- Residents and business entities, and individual entrepreneurs in the area of the project that can benefit from resilience capacity training program or exposure to other programmes relevant to the National Social Register;
- Local vendors who can support in the delivery of the NASSP-SU;

- Local, regional and national level civil societies (CSOs) and non-governmental organizations (NGOs);
- Other government ministries and regulatory agencies at state, zonal and national levels including environmental, technical, and social development agencies;
- NASSP-SU Project employees and vendors; and
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations.

### 3.3. Disadvantaged / vulnerable individuals or groups

It is critical to ensure that the SEP is designed with assurance that disadvantaged or vulnerable individuals or group's views and concerns are captured in the project design and its cash transfer system in manner that is equitable and culturally appropriate and acceptable. These measures are important to ensure a full understanding of the project activities and that all benefits can be equally accessed by all affected parties. This is because vulnerability may stem from a person's origin, gender, age, health condition, economic deprivation and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), dependence on other individuals, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistances aimed at the facilitation of their participation in decision-making process so that their awareness of and input to the overall process are commensurate to those of the other stakeholders. Within the scope of the NASSP-SU, the vulnerable or disadvantaged groups would include, but not limited to the following:

- Those living below the poverty line
- Elderly
- Individuals with chronic diseases and pre-existing medical conditions;
- Persons with disabilities
- Pregnant women
- Women, girls and female headed households
- Children in deprivation
- Daily wage earners
- Unemployed and the homeless
- Communities in remote and inaccessible areas
- Refugees and internally displaced people
- Migrant workers and immigrant workers
- People experiencing food insecurity

Others, are vulnerable groups within the communities affected by socio-economic and other shocks, discrimination, etc.

### 3.4 Summary of project stakeholder needs

Strong citizen and community engagement are a precondition for the effectiveness of the NASSP-SU. Stakeholder engagement under the NASSP-SU will be carried out on two fronts: (i) consultations with stakeholders throughout the entire project cycle to inform them about the project, including soliciting and incorporating their concerns, feedback and complaints about the project and any activities related to the project; and to improve the design and implementation of the project; and (ii) awareness-raising activities

to sensitize and mobilize communities. In terms of consultations with stakeholders on the project design, activities, and implementation arrangements, etc., a revised SEP is expected to be updated within 30 days after the project effectiveness date as mentioned above, and continuously updated throughout the NASSP-SU implementation period when required. The SEP clearly lays out:

- Type of Stakeholder to be consulted
- Anticipated Issues and Interests
- Stages of Involvement
- Methods of Involvement
- Proposed Communications Methods
- Information Disclosure
- Responsible authority/institution

#### 4. Stakeholder Engagement Program

##### 4.1. Purpose and timing of stakeholder engagement program

The Government of Nigeria, through the National Social Safety-Nets Project (NASSP), is committed to ensuring meaningful, effective and informed participation of stakeholders and partners according to the program or project cycle which include early planning, problem identification, program design, implementation and monitoring. Effective stakeholder engagement and participation enable cultivate and promote voice and accountability, project acceptance, local ownership and beneficiary's empowerment. It helps the project to be e social, and environmental sustainability. These will lead to full participation and achieving the project's outcomes and outputs with support of all stakeholders and reduce disagreement and conflict, support human rights and enhance social and environmental protection at the same time. NASSP and its partners will ensure the stakeholder analysis and engagement plan are effectively and sufficiently implemented in the project cycles with close linkage to the citizen engagement and social accountability activities

The approach will be hinged on the following elements: (1) the stakeholders that NASSP will engage with (2) the objectives for those audiences and (3) the key messages that will be used to engage them; and the channels to get to each target group. This approach will be used to enhance wide visibility for the Cash Transfer Programme and the Social Registry and strengthen relationships and collaborations with stakeholders to gain commitment and buy-in for the project.

This strategy is targeted at both external and internal stakeholders (stakeholder mapping attached)

##### INTERNAL

1. Relevant Internal stakeholders: NASSCO and NCTO staff, SCTU and SOCU, Federal Ministry of Humanitarian Affairs, Disaster Management and Social Development (FMHDSD), Federal Ministry of Finance, Budget and National Planning, other MDAs - Education, Women Affairs, Labour and Productivity, Youth and Sports, Agriculture, Health, Communication and Digital Economy; National Identity Management Commission, National Orientation Agency, National Primary Health Care Management Agency, National Health Insurance Scheme, National Directorate of Employment, etc.

##### EXTERNAL



1. Beneficiaries – Poor and vulnerable Nigerians identified by communities
2. Target communities; their local leaders, traditional rulers; Local Government Authorities
3. State and federal authorities (governors, commissioners/ministers of relevant ministries working with the poor and vulnerable, state and federal lawmakers)
4. Opinion shapers, political influencers, development experts (champions and adversaries)
5. Nigerian media, bloggers, social media influencers
6. Civil society groups, faith-based organisations,
7. Development partners (World Bank, DFID, WFP, EU, SCI, Swiss Government etc.)

There is need to engage each of the stakeholders (from 1-8 above) over a significant period every quarter.

#### CORE MESSAGING

1. The Government of Nigeria is committed to building a credible social register as a pillar for the poor and vulnerable.
2. Through cash transfer programme, the government is building resilience for the most vulnerable Nigerians, to lift them out of extreme poverty by giving them monthly stipends, building their capacity, and ensuring they establish a sustainable means of livelihood by end of their stay on the programme.
3. The Federal Government of Nigeria is very passionate about investing in social protection to ensure the effect of the economic depreciation on the poor is mitigated.
4. Transparent targeting mechanisms have been put in place to ensure that the project reaches its intended beneficiaries and women in particular.
5. State funding of Social Protection programmes is central to poverty eradication and improved social welfare.
6. In Nigeria, up to eight million people, among the poorest and most vulnerable, will have access to social safety nets until 2023 through a \$800 million International Development Association (IDA) credit approved by the World Bank. through the cash transfer component of the NASSP-SU.
7. The National Social Safety Nets Project supports the Government’s program by providing cash transfers to poor households throughout Nigeria, identified through a combination of geographical and community-based targeting, and digital delivery systems.
8. The GRM and its availability to project stakeholders.
9. The project will support a) citizen engagement and social accountability, b) gender and social inclusion.

Stakeholder engagement plans will be refined and adapted as the project implementation evolves. However, it is anticipated that the five purposes of consultations and information dissemination in the NASSP Communication Plan will be achieved by:

- (a) Adapting project interventions to the evolving needs of the affected populations;
- (b) Ensuring of coordination between all implementers and government and community authority structures;
- (c) Reception of feedback and comments as well as grievances from all stakeholders on project design, and implementation, and to adapt the project accordingly;
- (d) Provision of transparent and accountable mechanisms on all aspects of Project implementation and monitoring; and
- (e) Ensuring that members of vulnerable groups from project affected communities can participate fully in the consultation process and enjoy project benefits.

To ensure this, a grievance redress mechanism (GRM) will be in place throughout the life cycle of the Project and will be set up in a way that all affected individuals and groups can report on project-related grievances or can provide comments and feedback and will be leveraged by the social accountability aspect of the project. In addition, the ESCP and ESMP will be publicly disclosed on the NASSP website as well as in communities targeted by the project to ensure that everyone is informed about social and environmental risks and respective mitigation measures. The project will innovate ways for consultations to be effective and meaningful to meet project and stakeholder needs, in consideration of COVID-19 protocols. Strategies to be employed include smaller meetings, small focus group discussions (FGDs) to be conducted as appropriate - taking full precautions for staff and community safety. Where meetings are not permitted, traditional channels of s such as radio and public announcements/town criers will be implemented. Other strategies will include interviews with community representatives, CSOs and other interest groups. Community facilitators, who will be part of this process, will also enable two-way communication by way of collecting views from community members of various key groups such as men, women and other vulnerable groups.

#### 4.2. Proposed strategy for information disclosure

The SEP will ensure that the different activities for stakeholder engagement, including information disclosure, are inclusive and culturally sensitive. Measures will also be taken to ensure that the vulnerable groups outlined above will have the chance to participate and benefit from NASSP-SU activities. This will include among others, household-outreach through USSD/SMS, telephone calls, etc., in the major Nigerian local languages (Hausa, Igbo, Yoruba and Pidgin English), the use of verbal communication, audiovisuals or pictures instead of text, etc. Further, while country-wide awareness campaigns will be established, specific communications in every State, LGA and in every village will be timed according to the need, and also adjusted to the specific local circumstances of the individual communities.

**Table 1: A Preliminary Strategy for Information Disclosure and Consultation**

Project stage	List of information to be disclosed & Consultation	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Topic of consultation	Responsibilities
Project Inception	<ul style="list-style-type: none"> <li>- Project Appraisal Document (PAD)</li> <li>- SEP</li> <li>- ESCP</li> <li>- Other information as required</li> </ul>	<p>Official Meetings and official letters</p> <p>Participatory methods, public consultation, and documentation</p> <ul style="list-style-type: none"> <li>- Press releases in local media; virtual meetings, participating MDAs/CSO/NGOs</li> <li>- Notification Radio News and copy in village hall</li> <li>- Poster on community bulletin board</li> <li>- Town Hall Meeting/in-person meetings</li> <li>- Radio/TV</li> <li>- NASSP Website</li> </ul>	<p>Prior to approval and implementation of the project activities weeks of disclosure</p>	<ul style="list-style-type: none"> <li>- Officials of the Ministry of Humanitarian Affairs Disaster Management and Social Development (MHADMSD)</li> <li>- Development Partners</li> <li>- World Bank Groups</li> <li>- Poor and vulnerable households (PVHH)</li> <li>- Communities</li> <li>- Other relevant MDAs States</li> </ul>	<p>Project design, benefits, and impacts</p>	<p>World Bank, FMHADMSD</p>
Project Implementation	<ul style="list-style-type: none"> <li>- ESMP</li> <li>- Various awareness messages on prevention of Gender Based Violence (GBV)/Violence Against Children (VAC), and to access psychosocial support services</li> <li>- Availability of psycho social support for teachers and school administration</li> <li>- Grievance Redress Procedures;</li> <li>- Update on project implementation and progress;</li> </ul>	<ul style="list-style-type: none"> <li>- Information leaflets, posters and brochures; audio-visual materials, social media and other direct communication channels such as mobile/ telephone calls, SMS, etc.; Public notices; Electronic publications and press releases</li> <li>- website (www.nassp.gov.ng)</li> <li>- websites; Press releases in the local media (both print and electronic); Consultation with vulnerable and marginalized groups using mobile/ telephone</li> </ul>	<ul style="list-style-type: none"> <li>- Once in national dallies for the E&amp;S documents</li> </ul>	<ul style="list-style-type: none"> <li>- Project affected persons; and</li> <li>- Other interested parties/Community Actors</li> </ul> <p>The public at large</p>	<ul style="list-style-type: none"> <li>- Project relevant information</li> <li>- ESMP, SEP GRM and other relevant project documents</li> <li>- Project information and progress updates;</li> </ul>	<p>Gender Mgr., Comms. Specialist, Environmental Officer, Social Officer</p>

Project stage	List of information to be disclosed & Consultation	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Topic of consultation	Responsibilities
	Relevant E&S documents;	calls, SMS, etc. in a culturally appropriate manner; training and meetings; help desk mechanism; virtual meetings; virtual roundtable discussions - Town Hall Meeting - Radio/TV - Official NASSP				
Project Implementation (Activity : Supervision and Monitoring)	- Project's outcomes, overall progress and major achievements	- Monitoring reports; - Virtual roundtable discussions; Press releases; Press conferences; Public meetings; Reports; NASSP website;	Use pulsing approach with high intensity during the weeks of disclosure	- Project affected persons - Other interested parties - The public at large		Monitoring and Evaluation, Research and Learning
Project Close Out	- Project exit strategy; and - Dissemination of final project reports. - Lesson learning sessions/sustainability	Consultation meetings; information leaflets, posters and brochures; audio-visual materials, social media; Electronic publications and press releases on the NASSP websites; Press releases in local media (both print and electronic); media; roundtable discussions, stakeholders dissemination conference, implementation completion report (ICR)		- MDAs; Participating States; - Project affected person; and - Other interested parties	-Present Project completion and results information to a large group of stakeholders, especially communities -Allow stakeholders to provide their views and opinions.  -Distribute technical and non-technical information	NASSP

### 4.3. Proposed strategy for consultation

Given the information provided on success of NASSP past stakeholders engagement performance and noting that the NASSP-SU engagement is and will be similar to the NASSP, the due diligences assessment concluded that consultations with beneficiaries and stakeholder will occur in a similar manner, that is, advancing the continuation of community engagement and social accountability practices - where community groups are sensitized in targeted areas including representatives of groups (men, women, youth, minorities, disadvantaged groups), define and identify community poor and vulnerable, with opportunity for grievance redress; the same process is available to support the scale-up process for both the regular cash transfer and the emergency shock responsive cash transfer beneficiaries.

The NASSP-SU will employ the following strategies in consulting with the various stakeholder groups. Methods that will be used may vary according to target audience, for example:

- Interviews with stakeholders and relevant organization
- Surveys, polls, and questionnaires
- Public meetings, workshops, and/or focus groups on specific topic
- Participatory methods
- Other traditional mechanisms for consultation and decision making.

<b>Table 2: A Preliminary Strategy for Consultation</b>					
<b>Project stage</b>	<b>Topic of consultation</b>	<b>Methods proposed</b>	<b>Target stakeholders</b>	<b>Time table: Locations/ dates</b>	<b>Responsibilities</b>
Project Inception	<ul style="list-style-type: none"> <li>- Project design, benefits, and impacts</li> <li>- Project Appraisal Document (PAD)</li> <li>- SEP</li> <li>- ESCP</li> <li>- Other information as required.</li> </ul>	<ul style="list-style-type: none"> <li>Official Meetings and official letters</li> <li>Participatory methods, public consultation and documentation</li> <li>Project Update</li> </ul>	<ul style="list-style-type: none"> <li>- Officials of the Ministry of Humanitarian Affairs Disaster Management and Social Development (MHADMSD)</li> <li>- Development Partners</li> <li>- World Bank Groups</li> <li>- Poor and vulnerable households (PVHH)</li> <li>- Communities</li> <li>- State Governments</li> <li>- Other relevant Ministries, Departments and Agencies (MDAs).</li> </ul>	- Prior to approval and implementation of the project	World Bank, FMHADMSD, MFBNP.

<b>Table 2: A Preliminary Strategy for Consultation</b>					
<b>Project stage</b>	<b>Topic of consultation</b>	<b>Methods proposed</b>	<b>Target stakeholders</b>	<b>Time table: Locations/ dates</b>	<b>Responsibilities</b>
<b>Implementation and Monitoring</b>	<p>ESMP Update on implementation parameters; update on sub-comment issues such as SEA and GBV preventions, GRM types and closure, security, environmental mitigations, qualitative impact indicators, etc</p> <p>Cash Transfer (CT) project parameters, Fraud and SEA prevention</p>	<p>Field visits/ FGD public and Community Consultations.</p> <p>Consultations/ FGD, daily meeting/ field visits, GRM cases and accidents' reports and updates</p> <p>GRM/ incidents, GBV and SH prevention/ referral pathways and daily monthly/ biweekly reports.</p> <p>Grievance Redress Mechanism</p> <p>Progress Update</p>	<ul style="list-style-type: none"> <li>- Affected/ disadvantaged target groups, community committee</li> <li>- Affected and groups and community committee, injured and complained people</li> <li>- Community members, and GBV and SH survivors</li> <li>- Community Members and beneficiaries</li> <li>- Government; Communities</li> </ul>	- At start and throughout project implementation stage: Federal Government and key stakeholders at State level	NASSP-SU Team; Government and World Bank Team
<b>Evaluation and Closure</b>	M&E Spot-Checks where accessible; Third Party Monitoring Report, documentations	FGD with beneficiaries and non-beneficiaries	<ul style="list-style-type: none"> <li>- Affected, interested/disadvantaged and non-beneficiaries, and local government</li> </ul>	- Preparatory to project close out and during implementation completion reporting	NASSP-SU Team; Government and World Bank Team

#### 4.4. Proposed strategy to incorporate Beneficiary and vulnerable people views

Due to the varying needs of the vulnerable groups, the Project team will adopt differentiated approaches to engage with vulnerable groups. The NASSP-SU will carry out targeted consultations with vulnerable groups to understand concerns/needs in terms of accessing information, and other challenges they face at home, and in their communities. Specific interventions will be conducted to improve the inclusion, particularly of women, people with disabilities, and the poor and vulnerable households. Such interventions could include establishing a dedicated hotline to provide support with registration problems, establishing dedicated stalls in communities to help people register and leveraging the existing Community Based Targeting approaches and community outreach, including possible home visits for persons with disabilities. In addition to specific consultations with vulnerable groups and women, the project will partner with relevant agencies, academia and civil society.

Some of the strategies that will be adopted to effectively engage and communicate with vulnerable groups will be:

- Poor and vulnerable households – Community-based targeting process; pre-sensitization, sensitization and community mobilization, community engagement; Poor urban informal workers – technology-based identification and ground truthing process/validation.
- Women: ensure that community engagement teams are gender-balanced and promote women’s leadership within these, design online and in-person surveys and other engagement activities so that women can participate.
- Elderly and people with existing medical conditions: develop information on specific needs and explain why they are at more risk & what measures to take to care for them; tailor messages and make them actionable for particular living conditions (including assisted living facilities), and health status; target family members, health care providers and caregivers.
- Persons with disabilities: provide information in accessible formats, like braille, large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for hearing impaired, online materials for people who use assistive technology.
- Children: design information and communication materials in a child-friendly manner & provide parents with skills to handle their own anxieties and help manage those in their children.
- For other specific groups such as refugees, the homeless and migrant workers, and as with the other vulnerable groups, the project will ensure that consultation with the groups are meaningful. As indicated in the ESS10, meaningful consultation is a two-way process that:
  - o Begins early in the project planning process to gather initial views on the project and inform them on project design;
  - o 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;
  - o Continues on ongoing basis, as risks and impacts arise;
  - o Is based on prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a time frame that enable meaningful consultation with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;
  - o Considers and responds to feedback.
  - o Supports active and inclusive engagement with project-affected parties.
  - o Is free of external manipulation.

NASSP-SU will adopt these approaches in consulting with vulnerable groups.

#### 4.5. Timelines

The project is planned for a duration of two years. The stakeholder consultations shall be conducted throughout the project lifecycle. It is currently ongoing as the project is being prepared and will be continue throughout project implementation. Information disclosure and consultations during project implementation will include monthly visits and meetings with community leaders and regular meetings with local authorities. Activities under each sub-component will include further consultations prior to their commencement to ensure appropriate identification, selection and enrolment of beneficiaries, ensure transparency and accountability on project modalities, and to allow community voices to form the basis of the design of every intervention. Consultations will continue throughout the project cycle. The detailed SEP will be prepared prior to commencement of the sub-component activities depending on the context of the subproject and will be updated periodically. The , including mapping of stakeholders, engagement and integration of voices is linked to the ESCP.

#### 4.6 Future Phases of Project

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism. Projects should report at least bi-annually to stakeholders, but often will report more frequently during particularly active periods, when the public may experience more impacts or when phases are changing (for example, quarterly reports during construction, then annual reports during implementation).

### 5. Resources and Responsibilities for implementing stakeholder engagement activities

#### 5.1. Resources

The SEP would be implemented by the NASSP-SU project team, at the Federal and State levels, especially the Targeting Team, the Grievance Redress Management (GRM) Team, Communications and Stakeholder Engagement, etc. in partnership with other relevant public agencies, international organizations, private entities, NGOs and CBOs. Budget for the SEP would be set aside under the appropriate budget sub-head. Component 3 - Delivery System Strengthening and Program management US\$ 30 million will be used to finance the SEP activities throughout the project lifecycle. Component 3 will expand and strengthen the social assistance/safety nets delivery systems through increased integration and use of digital technologies at various stages of the delivery chain and provide project management support.

#### 5.2. Management functions and responsibilities

The NASSP-SU will be implemented through the National Social Safety Net Coordinating Office (NASSCO) and National Cash Transfer Office (NCTO) as the mandated institution for Social Safety Nets Programming in Nigeria. The NASSP-SU will build upon the existing systems, infrastructure and institutional arrangements of the NASSP. The NASSP-SU will be supported under the existing arrangements of NASSP by strengthening and enhancing support to the project implementation.

NASSP and the PIUs implementing different sub-components of the project will collate all feedback originating from community meetings, SMS, GRM outcomes, surveys and FGDs. The information gathered will be submitted through the appropriate channel to management – specifically to the Social and Environmental Risk Management Officers, who shall collate the information and escalate as appropriate to ensure that the project has general information on the perception of communities, and that it remains on target. The Environment and Safeguard Specialist will provide overall oversight.

Going forward, and throughout project implementation, the NASSP institutional capacity will need to be strengthened in a coordinated approach between all Project partners (Federal, State and LGs, Private, NGOs, CBOs). The stakeholder engagement activities will be documented through quarterly progress reports, to be shared with the World Bank.

### 6. Grievance Mechanism

The main objective of a Grievance Redress Mechanism (GRM) is to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective, and lasting outcomes. It also builds trust and



cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Supports accessibility, anonymity, confidentiality and transparency in handling complaints and grievances;
- Avoids the need to resort to judicial proceedings (at least at first).

The Project will adopt the GRM established in the NASSP.

### **Description of the GRM**

NASSP already has a fully developed and functional GRM system, guided by an approved GRM manual. Under the NASSP, 74 State GRM Managers and 774 Local Government (LG) grievance redress officers (GROs) were recruited across 37 States and FCT in addition to several community level grievance redress volunteers (GRVs).

The NASSP GRM includes the following steps:

- Step 1: Submission of grievances either orally, in writing via suggestion/complaint box, through telephone hotline/mobile, mail, SMS, social media (WhatsApp, Instagram, Twitter, FaceBook, etc.), email, website, etc.
- Step 2: Recording of grievance, classifying the grievances based on the typology of complaints and the complainants (who can be anonymous or request confidentiality) in order to provide more efficient response, and providing the initial response immediately as possible. The typology will be based on the characteristics of the complainant (e.g., vulnerable groups, persons with disabilities, people with language barriers, etc.) and the nature of the complaint (e.g., inability to access the information, error, fraud, corruption, etc.).
- Step 3: At each tier (community, state, national), all grievances would have to be investigated and resolved within 7 working days. Any grievances that cannot be satisfactorily resolved within 7 working days would have to be escalated to the next tier.
- Step 4: Complainant Response: either grievance closure or taking further steps if the grievance remains open.

The NASSP GRM has developed an IT based system to manage the entire GRM system. Monthly/quarterly reports in the form of a summary of complaints, types, actions taken, and progress made in terms of resolving pending issues are submitted for review to all focal points at different tier levels. Once all possible avenues of redress have been proposed and if the complainant is still not satisfied then s/he would be advised of their right to escalate to the next level or take legal recourse.

**Handling SEA/SH issues:** Currently under NASSP, the National and State PIUs are implementing activities provided in the GBV Action Plan which also includes mapping of GBV Service Providers in all the 36 states and the FCT. The Bank Social Team support activities towards the development of SEA/SH Manuals, and training on the mapping processes. All GBV cases received by the community level, state level and national level GRC will be referred to the GBV Service Providers. GBV referral pathways will be established and

updated in line with NASSP structures from the local to the national. Psychosocial support will be available for women and girls who may be affected by shocks and are also GBV survivors.

The GRM system in place for the NASSP project will also be used for addressing GBV-related issues and will have in place mechanisms for confidential reporting with safe and ethical documenting of issues under the NASSP-SU. Further, the GRM will also have in place processes to immediately notify both the NASSP-SU and the World Bank of any GBV complaints, with the consent of the survivor. The project will also educate the public that the GRM can be utilized to raise concerns or complaints, especially related to GBV and SEA/H issues. Thus, the existing GRM will also be strengthened with procedures to handle allegations of GBV/SEA/SH violations.

In the updated version of the SEP, focus will be given on typology of complaints and complainants to provide more efficient management. Possible examples: the highly vulnerable, persons with disabilities, people facing language barriers, etc. The contact information for the GRM officers will be provided in the updated SEP which will be finalized 30 days after the project effectiveness date.

## **7. Monitoring and Reporting**

### **7.1. Involvement of stakeholders in monitoring activities**

The Project will provide an opportunity to stakeholders, especially Project Affected Parties, to monitor certain aspects of project performance and provide feedback through Social Accountability and the GRM. While the GRM will allow stakeholders to submit grievances and the SA will play key role in completing the feedback loop among actors (project, cash transfer programme and beneficiaries). Frequent and regular meetings and interactions with stakeholders will be maintained using several consultative methods that include in-person meetings, online meetings, disseminations, third party monitors, standard operating procedures (SOPs). In addition, during implementation of the project, the other alternative methods such as TV, newspaper, radio, dedicated caller-lines, and mail and social media and online channels, dedicated online platforms and chatgroups will be maintained and used.

The Project, similar to NASSP, will employ the use of Third-Party Monitoring (TPM) implemented through independent Civil Society Organization (CSOs). The project will enhance social accountability through regular TPM and implementation of an Annual Results Scorecard produced by the third-party monitors. The scorecards and reports produced by the monitors will be released in the public domain. Tools such as quarterly TPM reports, scorecards, and the GRM monthly reports will feed into program implementation by informing if and how project design or activities need to be modified to accommodate pressing concerns at the local, state, or national levels.

### **7.2 Review of Feedbacks**

It will be the responsibility of the joint PIU Environment and Safeguard Specialists to gather, collate and respond to comments and inputs, and to keep open a feedback line to the communities, as well as the local authorities. Training on environmental and social standards facilitated by WB and NASSP will be provided after the project becomes effective to ensure that all implementing staff are equipped with the necessary skills. This SEP provides the overarching guidelines for the rolling out of stakeholder engagements. While this SEP will be refined once the different communication and consultation modalities of the technical leads can be elaborated on, the guiding principles will remain in place. The environmental and social safeguards specialists within the PIUs will continue to monitor capacity at the operational level, and recommend appropriate actions, e.g., refresher trainings.

### 7.3 Reporting back to stakeholder groups

Following its finalization within 30 days of Project Effectiveness, the SEP will be periodically revised and updated as necessary in the course of the NASSP-SU implementation in order to ensure that the information presented therein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the NASSP-SU context and specific phases of the development. Any major changes to the NASSP-SU related activities and to its schedule will be duly reflected in the SEP and subsequently redisclosed.

Quarterly summaries and internal reports on grievances, enquiries and related incidents—together with the status of implementation of associated corrective/preventive actions—will be collated by the designated GRM officer, and referred to the senior project management team. The quarterly 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 through monitoring of a beneficiary feedback indicator on a regular basis. The indicator will be determined in the updated SEP and may include: number of consultations, including by using telecommunications carried out within a reporting period (e.g., monthly, quarterly, or annually); number of grievances received within a reporting period (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; number of press materials published/broadcasted in the local, regional, and national media.

Further details on the SEP will be outlined in the updated SEP, to be prepared and disclosed within 30 days after the project effectiveness date.

A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, based on agreed parameters; e.g.:

- Frequency of public engagement activities;
- Number of grievances received and resolved within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; and
- Number of press materials published/broadcasted in the local, and national media.