



FEDERAL MINISTRY OF FINANCE, BUDGET AND NATIONAL PLANNING

**STAKEHOLDERS ENGAGEMENT PLAN
FOR
NIGERIA STATE ACTION ON BUSINESS ENABLING REFORMS (P177442)**

AUGUST 10, 2022

ACRONYMS

| | |
|---------|---|
| AP | Action Plan |
| CBO | Community Based Organization |
| DLI | Disbursement Linked Indicator |
| DP | Development Partner |
| EA | Environmental Assessment |
| EBES | Enabling Business Environment Secretariat |
| E&S | Environment and Social |
| EIA | Environmental Impact Assessment |
| ERGP | Economic Recovery and Growth Plan |
| ES | Environmental Standards |
| ESCP | Environmental and Social Commitment Plan |
| ESS | Environmental and Social Standards |
| ESF | World Bank Environmental and Social Framework |
| ESMP | Environmental and Social Management Plan |
| FCT | Federal Capital Territory |
| FGD | Focus Group Discussion |
| FGN | Federal Government of Nigeria |
| FMoFBNP | Federal Ministry of Finance, Budget and National Planning |
| FMWA | Federal Ministry of Women Affairs |
| FMWP&H | Federal Ministry of Works, Power and Housing |
| FPCU | Federal Project Coordinating Unit |
| GBV | Gender Based Violence |
| GDP | Gross Domestic Product |
| GRM | Grievance Redress Mechanism |
| GRS | Grievance Redress System |
| KPI | Key Performance Indicator |
| LGA | Local Government Area |
| MDA | ministries, departments and agencies |
| NDP | National Development Plan |
| NEC | National Economic Council |
| NGF | Nigeria Governors' Forum |
| NGO | Non-Governmental Organization |
| NOA | National Orientation Agency |
| PAPs | Project Affected Persons |
| PEBEC | Presidential Enabling Business Environment Council |
| PforR | Program-for-Results |
| RA | Results Area |
| SABER | State Action on Business Enabling Reforms |
| SEP | Stakeholder Engagement Plan |
| WB | World Bank |

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1.0 INTRODUCTION

1.1 Background

Nigeria is the most populous country and the largest economy of Sub-Saharan Africa with over 200 million people and an estimated gross domestic product (GDP) of USD421 billion in 2021. The outlook for Nigeria's growth is uncertain and highly dependent on external factors and the government's overall policy response to longstanding issues. Nigeria's growth is expected to remain above population growth in 2022-2023, averaging 3.2 percent. Even in the most favorable global context, the policy response of Nigeria's authorities will be crucial to lay the foundation for a robust recovery. The authorities can boost growth by strengthening macroeconomic reform efforts, including measures aimed at: (a) adopting a more flexible and transparent foreign exchange management regime; (b) accelerating revenue-based fiscal consolidation; (c) strengthening expenditure and debt management; and (d) improving the business enabling environment. Catalyzing private investment is needed to boost growth and create jobs; however, Nigeria's ability to attract domestic and foreign investment is low compared to its peers and declining. The current fiscal pressures faced by the country have further underlined the imperative that crowding in private investment at scale is needed to achieve Nigeria's development priorities.

Given the urgency of reforms to improve the business enabling environment, the government is developing a new program—the State Action on Business Enabling Reforms (SABER)—to accelerate the implementation of critical actions that improve the business enabling environment in Nigeria's states and the Federal Capital Territory (FCT). The Government's SABER program will build on the successes of the Presidential Enabling Business Environment Council (PEBEC). It will prioritize critical measures and interventions, with a focus on accelerating targeted business-enabling environment reform actions at the state level. It aims to strengthen the existing PEBEC-National Economic Council (NEC) subnational interventions by adding incentives, namely results-based financing to the states, and the delivery of wholesale technical assistance—available to all states—to support gaps in reform implementation.

The proposed SABER Program will support the most critical state-level business enabling reforms of the Government's SABER program, which in turn is anchored in the National Development Plan (NDP) 2021-2025's Business Environment, Trade and Competitiveness Pillar, which is implemented through PEBEC's federal and PEBEC-NEC's state initiatives. PEBEC's mandate was articulated in the Economic Recovery and Growth Plan (ERGP) 2017-2020 and subsequently retained in the NDP 2021-2025. The proposed operation consists of a USD730 million Program-for-Results (the Program) and a USD20 million Investment Project Financing (IPF) component (the Project). The Program Development Objectives (PDO) is to improve the business enabling environment in the participating states.¹ The proposed Program is expected to be a subset of the Government's program to improve the business enabling environment at the state level. The duration of the Program-for-Results (PforR) is proposed to be 3 years, from 2023 to 2025.

The proposed IPF Component for Technical Assistance (the Project) will provide implementation support and capacity strengthening for the Project Coordinating Unit (PCU), implementing units and partners, and participating states. The Home Finance Department (HFD) of the Federal Ministry of Finance, Budget and National Planning (FMFBNP) will serve as the PCU. The PCU will engage the Nigeria Governors' Forum (NGF) as a project management firm to support the PCU to implement specific capacity building and learning activities. The project management firm will support the PCU to implement specific capacity building and learning activities, including technical workshops and clinics on the Results Areas (RAs) and the Disbursement Linked Indicators (DLIs), customized just-in-time hands on support at the individual state level through mobile teams and the NGF's helpdesks, and peer learning forums to facilitate learning

¹ When mentioning participating states, this includes FCT.

across States on the RAs and DLIs of the Program. PEBC’s Enabling Business Environment Secretariat (EBES) is expected to play a critical role in the delivery of the IPF Component through its subnational interventions, including a strong performance tracking element, and its leadership role through the Technical Working Group (TWG). In addition, on DLI5 (increased transparency of official fees and procedures) and DLI8 (quick determination of commercial disputes), EBES will provide intense technical support to the participating states and EBES will also take the lead on private sector engagement.

In compliance with the requirements of Environmental and Social Framework (ESF), the Environmental and Social Standards (ESS) 10 on Stakeholder’s Engagement and Information Disclosure, the implementing agencies are expected to 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.

This document presents the Stakeholder Engagement Plan (SEP) which is prepared to address stakeholder management associated with the IPF Component of the SABER Operation. The SEP is a participatory tool designed to provide guidance on how the various agencies involved in the IPF Component 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.

1.2 Project Description

The \$20 million IPF Component for technical assistance (the ‘Project’) has two sub-components: (1) Strengthening State Government Systems and Capacities; and (2) Strengthening Program Coordination and Verification of Results. The first component will be the largest, focusing on providing capacity support to all participating state governments to strengthen their systems and capacities to enable them to achieve the Program results (the DLRs). The IPF Component will be delivered by selected national-level institutions who are critical for supporting state governments to achieve Program results as well as to strengthen state government capacities in a sustainable manner.

The Project has two sub-components:

Sub-Component 1: Strengthening State Government Systems and Capacities – The technical assistance (TA) is expected to be available for all States to strengthen the capabilities of the States in achieving the Program’s Disbursement Linked Results (DLRs) through training and learning support. The IPF component will provide direct support to participating state governments to enable them to achieve the DLRs. Support will be provided to all States and FCT on result areas and DLIs that are not currently supported by existing programs (e.g., Ogun State Economic Transformation Project). Table 1 below presents some areas the TA will strengthen under each DLI.

Table 1: Technical Assistance by DLI

| SABER Program DLIs | Areas of Strengthening State Government Systems and Capacities |
|---|--|
| Eligibility Criteria | <ul style="list-style-type: none"> ● Preparation of State-Business Enabling Reform Action Plans ● Preparation of Annual State Debt Sustainability Analysis and Debt Management Strategy Report (SDSA-DMSR) |
| DLI1: Improved transparency and sustainability in the | <ul style="list-style-type: none"> ● Technical and legal assessments to support design / or upgrading of land administration system, specifically database and processing of CofOs |

| | |
|--|---|
| property registration and land investment process | <ul style="list-style-type: none"> ● Consultancy for communication and outreach strategy to support uptake of CoFo registrations by women and other vulnerable groups ● Peer-learning events across states (virtually, through physical events, etc.) |
| DLI2: Increased fiber optic network deployment and access to broadband | <ul style="list-style-type: none"> ● Support to states to liaise with operators and track fibre deployment at state level (e.g., request templates, capacity-building for data-gathering offices and teams) ● Template/model regulation /circular with instructions and guidance, and communications (re ROW fee) |
| DLI3: Development of an effective PPP framework for States | <ul style="list-style-type: none"> ● Good practice experiences (including possible templates/model framework documents from ICRC); example documents for PPP legal, regulatory, an including the laying down detailed institutional processes and criteria for identification, screening, preparation, procurement, and contract management processes, functional roles and responsibilities, and templates, toolkits, and standards forms for use at every stage, and templates. ● Workshops/ knowledge sharing programs (e.g. bringing states that have successfully completed one or more PPP elements to share their experience in a specific area) |
| DLI4: Improved Investment Promotion Environment | <ul style="list-style-type: none"> ● Workshops/training programs across States (physical and virtual) on institutional set up of IPAs, including organizational structure, governance, corporate strategy and KPIs ● Support towards development of State IPA Websites ● Workshops/training programs on investor services across States (physical and virtual) – marketing, information, assistance, and advocacy ● Training on designing and implementing aftercare and retention program ● Training on designing and implementing targeted outreach campaigns in priority sectors ● Support towards development of Investor tracking system ● Training on incentives inventory development and data collection |
| DLI5: Increased Transparency of official fees and procedures | <ul style="list-style-type: none"> ● Assessment of the baseline information on existing state websites (i.e. check on whether contact info, laws, etc. are available) ● Peer learning among states from the states with well-functioning websites (include DLI8 clients) ● Training on regulatory predictability and transparency ● Support capacity building of entities such as SERVICOM and the Public Complaints Commission for effective GRM implementation at state level |
| DLI6: Improve domestic and external trade competitiveness | <ul style="list-style-type: none"> ● Peer-to-peer learning from best practice jurisdictions & TA on elimination of fees and process simplification for exporting goods ● TA for design, deployment, and upkeep of complaints mechanism on interstate trade ● Workshop on market access and export procedure/documentation (train the trainer model) |
| DLI7: Simplified state and local business tax regimes | <ul style="list-style-type: none"> ● Capacity building of the state internal revenue services (SIRSs) in the areas of: (a) assessment, (b) Service Level Agreements, (c) Complaints Processes (add clients for DLI8) and (d) improving tax administration with the customer (Taxpayer) at the center and (e) audit modalities of the turnover tax through NGF IGR HELPDESK |
| DLI8: Quick determination of commercial disputes | <ul style="list-style-type: none"> ● Framework documents and guides for the practice directions ● Knowledge sharing by states already having implemented special courts ● Templates for court reporting (productivity/clearance rates, etc.) ● Design and good practices in automated case management systems |

Sub-Component 2: Strengthening Program Coordination and Verification of Results: The technical assistance activities will support Program management and independent verification through the financing of the functioning of the PCU. The PCU will ensure that inputs are well-designed, and that sufficient quality assurance is provided, including on the verification of the results. Through the PCU,

an external firm will be hired to carry out the role of the Independent Verification Agency (IVA) for the Program. The IPF Component will support coordinating efforts of MDAs to collect baseline and end-of-program data for the intermediate results that will be inputs into the verification process. This will be achieved through consultants, who will work as specialists within the PCU, alongside seconded staff from the FMFBNP, on specific areas of Program management: Program supervision, Communications and Outreach, Procurement, Financial Management, and Environmental & Social Risk Management.

The PCU will carry out a regular extensive program of communication and outreach activities with State Governments on the Program. The Bank will work alongside the PEBEC-EBES and PCU to design and organize activities with all Program stakeholders to enable regular dialogue and information sharing - starting before Program effectiveness and throughout the duration of the Program. It is envisaged that at least twice a year, there will be a peer forum convening key stakeholders across States to collectively review progress (based on the results of the annual performance assessment, APA), showcase and learn from success, identify implementation challenges and problem-solve, and plan for the next year of the Program. The forums will leverage existing communities of practice for state Commissioners of Finance, Budget and Planning. The Communications Specialist will assist the Program Manager to implement and coordinate these activities, possibly supported by a digital communications specialist.

PEBEC-EBES is also expected to organize the private sector engagement: Organized private sector, if engaged meaningfully and constructively, can be a sounding board for reform identification as well as a 'watchdog' of the Program's progress towards its objectives. Organized private sector is a member in PEBEC and the TWG. With SABER expected to operate in most, if not all, states and covering reform action for firms of all sizes, the private sector would ideally be organized in a similar way. Micro and small firms are less organized; however, efforts will be made to get inputs from all sizes of firms. In addition, through the Program's DLIs/DLRs, opportunities for the private sector to get hands-on support (through IPAs), report concerns, and hold State ministries, departments and agencies (MDAs) accountable for government-to-business services will be improved. Finally, PEBEC-EBES also systematically engages the private sector through a survey for its subnational Ease of Doing Business report.

1.3 Stakeholder Engagement Plan and Disclosure

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the Project and any activities related to the Project. The involvement of the local population is essential to the success of the Project to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

The project will ensure a Grievance Redress and Feedback Mechanism is in place for people to report concerns or complaints if they feel unfairly treated or are affected by any of the Project (IPF Component) activities.

This SEP is a living document that will be updated during project implementation as more details on the stakeholders' groups and measures are identified.

1.4 Stakeholder Engagement within the context of IPF Component of the SABER Operation

The Government of Nigeria, through the IPF Component (the Project) of the SABER Operation is committed to ensuring meaningful, effective, and informed participation of stakeholders and partners according to the project cycle which include early planning, problem identification, program design, implementation and monitoring. Effective stakeholder engagement and participation enables, and promotes voice and accountability, project acceptance, local ownership, and beneficiary's empowerment. These will lead to full participation and achieving the project's activities 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. The Project 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.

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;
- **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 Stakeholder Engagement to date and Key Feedback received during Stakeholder Consultations

Feedback from stakeholders has been instrumental in designing and revising the Operation's Description (including the Project), indicators, and appraisal documents via providing data and details on the existing situation, management status and priorities of the federal government, the states and the private sector. A series of consultations, organized by the FMFBNP and PEBEC-EBES, were held with State Governors, State Commissioners of Finance, the SABER Technical Working Group, relevant Federal and State government MDAs, and the private sector, which led to refining of the Operation, including the Project. Other consultations held include the presentation of questions for the pre-Environmental and Social Systems Assessment (ESSA) to the Operation's stakeholders, during which the SEP and its requirements were also discussed (Table 2).

Table 2: Summary of Stakeholder Consultations Dedicated solely to environmental and social aspects

| S/No | Consultation | Meeting Dates | Participants | Meeting themes | Feedback | Venue |
|------|--------------|---------------|--------------|----------------|----------|-------|
|------|--------------|---------------|--------------|----------------|----------|-------|

| | | | | | | |
|---|--|--|---|--|---|--|
| 1 | Pre-ESSA Consultations with states (Edo, Ekiti, Kaduna, Nasarawa, Gombe and Enugu) | 19 th – 20 th July, 2022 | State Commissioners from the 6 focal states, Focal Person SABER and SFTAS, MD Edo State Investment Promotion Office, Edo Geographic Information Service, EBES | <ul style="list-style-type: none"> ● Clarity of program design ● Discussion on Program ESSA ● Policies and plans ● Implementation procedure ● Track record of system assessment to understand the environmental and social systems of the state ● Request for documentation on environmental and social systems at the state level ● Project design and implementation priorities ● Discussion on the ESF requirements | Participants provided inputs to the various questions posed on the ESSA questions. | Virtual Meetings/Consultations with the States |
| 2 | Kickoff workshop for the Pre-Appraisal mission with staff of the FMFBNP and PEBEC. | 25 th July, 2022 | Program Manager SFTAS | <ul style="list-style-type: none"> ● Discussion on the ESF requirements on the TA component - specifically the SEP ● Disclosure process for the ESCP & SEP ● Discussion on the potential environmental and social risks associated with the proposed TA activities | Timelines for finalization of the ESF documents were agreed. The need for the Bank to support the PCU capacity building training on ESF requirements was emphasized by the PCU. Additional training on the ESF requirement will be carried out during the implementation of the Project. The Program and Project will rely on some of the existing structures on E&S (such as GRM) set-up by SFTAS and improve on them. | Physical meeting at the Budget Office, FMFBNP, Abuja |

1.7 Overall Objectives

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

- To identify the roles and responsibilities of all stakeholders and ensure their participation throughout the project life cycle.
- To establish a systematic approach to stakeholder engagements that will help the SABER 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 SABER 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 ESF, particularly ESS-10.

1.8 Limitations

The stakeholder engagement is an on-going process of the project. 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 with 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.

1.9 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 ESF 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 Roles and Responsibilities

- 6.0 Grievance Management: Discusses the Grievance Redress System and Grievance Resolution Framework
- 7.0 Monitoring and Reporting: Discusses effective continuous engagement and follow-up for the fulfilment of the project components.
- 8.0 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 necessitate 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 2011

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 who is denied information can initiate court proceedings to affect 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 of Nigeria

Chapter two (2) of the Nigerian constitution takes socioeconomic rights of Nigerians into account. This chapter indicates 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 considers the use of resources and provides that *the* environment must be protected and natural resource like water, air, and land, forest and wildlife 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, wastewater 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 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 considered, 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 refers to individuals or groups who: are affected or likely to be affected by the project (project-affected parties); and may have an interest in the project (other interested parties). 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 Project (IPF Component of the SABER Operation) stakeholders are defined as individuals, groups or other entities who:

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

3.2 Stakeholder Categorization

For the purposes of effective and tailored engagement, the stakeholders of Nigeria SABER 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 Project. They include the:

- Project Coordinating Unit (PCU) housed in the Home Finance Department (HFD) of the FMFBNP
- Presidential Enabling Business Environment Council (PEBEC)’s Enabling Business Environment Secretariat (EBES)
- Nigeria Governors’ Forum (NGF) (as implementing partner)

To meet best practice approaches, the 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 will be provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns;
- Inclusiveness and sensitivity: Stakeholder identification are undertaken to support better communications and build effective relationships. The participation process for the project(s) is

inclusive. All stakeholders always 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.

3.2.2 Project Affected Parties

The directly affected parties that are likely to be impacted directly by the Project are the expected beneficiaries of the TA and include:

- Office Of the State Governors
- State Judiciary
- State Ministries of Finance/Budget/Planning, or equivalent
- State Ministries of Trade/investment/Commerce/Industry, or equivalent
- State Ministries of Land and Urban Planning, or equivalent
- State Investment Promotion Agencies, or equivalent
- State Ease of Doing Business Councils
- State Reform Champions

Other State MDAs that are identified by these lead MDAs for the DLIs as critical for the achievement of the DLIs of the SABER Program are also expected to be invited to the TA activities.

The directly affected parties also include but are not limited to project workers especially people that may be excluded due to their gender, or forms of disabilities, Nigerian citizens (public), This group is the core target audience and will be directly affected by the project implementation. 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 Project.

Indirectly impacted parties may be micro small and medium scale enterprises (MSMEs), private sector associations, business owners, stakeholders and other nonstate actors (including CSOs/CBOs). The private sector is expected to be a directly impacted party for the PforR Program, but not for the IPF Component (the Project).

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

3.2.3 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:

- Consultants who can support in the delivery of the project;
- Local, state and national level civil societies and non-governmental organizations (NGOs);
- Other government ministries and regulatory agencies at state and national levels;
- Mass media and associated interest groups, including local, state and national printed and broadcasting media, digital/web-based entities, and their associations.

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 them during implementation of the various activities listed under the Technical Assistant IPF Component of the Operation. As the Project is a small component of the Operation, almost all stakeholder engagement is expected to be organized for the Operation, which will also benefit the Project.

While advancing effective, inclusive and meaningful engagement with project- affected parties, the PCU with support from implementing agencies and partners (e.g., EBES and NGF) 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 understand 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 all project level activities that involve group gathering including meetings, focus group discussions, stakeholder workshops and training activities comply with the COVID-19 guidelines as stipulated by the Nigeria Centre for Disease Control (NCDC) (See Annex 2 for World Bank guidelines for organizing stakeholder consultations);
- j) Ensure that consultation(s) is/ are free of external manipulation, interference, coercion, discrimination, and intimidation; and
- k) Ensure consultation (s) is/are documented and disclosed.

4.1 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. This will be done by focus group discussions, monitoring participation rates, undertaking beneficiary assessments, and using online platforms to allow access to otherwise disadvantaged groups.

When selecting an appropriate consultation technique, culturally appropriate consultation methods, and the purpose for engaging with a stakeholder group shall be considered. The techniques to be considered are shown in Table 3 and 4 below.

Table 3: Stakeholder Engagement Techniques

| S/N | Engagement Technique | Appropriate application of the technique |
|-----|----------------------------------|---|
| 1 | Correspondences (Phone, Emails) | Distribute information to Government officials, NGOs, State 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/discussions | 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 relevant project documentation |
| 7 | Project leaflet | Brief project information to provide regular update Site specific project information. |

Table 4: 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 state and national stakeholders. | Printed materials present illustrative and written information on the 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 | Notification of forthcoming public events or | Placement of paid information in local, state and national printed media, including those intended for | <ul style="list-style-type: none"> ▪ All projected affected parties |

| Method / Tool | Description and Use | Contents | Dissemination Method | Target Groups |
|-----------------------------|---|--|---|--|
| | stories in the printed media – newspapers and magazines | commencement of specific Project activities. General description of the Project and its benefits to the stakeholders. | general reader and specialised audience. | <ul style="list-style-type: none"> ▪ All project interested parties ▪ Other potential stakeholders |
| Radio or television entries | Short radio programmes, video materials or documentary broadcast on TV. | Description of the Project, Project development update and processes. Advance announcement of the forthcoming public events or commencement of specific Project activities. | Collaboration with media producers that operate in the region and can reach local audiences. | <ul style="list-style-type: none"> ▪ Government Ministries, Departments and Agencies ▪ 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 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 | Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, | <ul style="list-style-type: none"> ▪ All projected affected parties ▪ All project interested parties |

| Method / Tool | Description and Use | Contents | Dissemination Method | Target Groups |
|--|---|---|--|---|
| | | changes to the scheduled process. | post offices, shop, local administrations. | ▪ 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. Audiences are also given free access to a register of comments and suggestions. | ▪ All projected affected parties |
| Dedicated telephone line (hotline) | Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations and environmental protection. | Any issues that are of interest or concern to the direct project beneficiaries and other stakeholders. | Telephone numbers are specified on the printed materials distributed to Project stakeholders and are mentioned during public meetings. Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration. | ▪ Any project stakeholder and interested parties. |
| Internet/Digital Media | Launch of Project information on FMFBNP, PEBC (and state actors) website to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public. | Information about Project operator and shareholders, Project development updates, employment and procurement, environmental and social aspects. | A link to the Project website should be specified on the printed materials distributed to stakeholders. Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc. | ▪ Project stakeholders and other interested parties that have access to the internet resources. |

| Method / Tool | Description and Use | Contents | Dissemination Method | Target Groups |
|---|--|--|---|--|
| | <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 available in English</p> | | <p>Limitation: Not all parties/stakeholders have access to the internet, especially in the remote areas and in communities.</p> | |
| Surveys, Interviews and Questionnaires | <p>The use of public opinion surveys, interviews and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.</p> | <p>Description of the proposed Project and related processes.</p> <p>Questions targeting stakeholder perception of the Project, associated impacts and benefits, concerns and suggestions.</p> | <p>Soliciting participation in surveys/interviews with specific stakeholder groups.</p> | <ul style="list-style-type: none"> ▪ All project affected parties. |
| Feedback & Suggestion Box | <p>A suggestion box can be used to encourage citizens to leave written feedback and comments about the Project.</p> <p>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.</p> | <p>Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.</p> | <p>Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the stakeholders.</p> <p>Information about the availability of the suggestion box should be communicated as part of Project's regular interaction with stakeholders.</p> | <ul style="list-style-type: none"> ▪ Project affected parties, especially vulnerable groups. |
| Consultation & Participation | | | | |
| Public hearings | <p>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 statutory expert review.</p> | <p>Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.</p> | <p>Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media.</p> | <ul style="list-style-type: none"> ▪ Project affected parties ▪ Relevant government Ministries Departments and Agencies. |

| Method / Tool | Description and Use | Contents | Dissemination Method | Target Groups |
|---|--|--|--|--|
| | | | <p>Targeted invitations are sent out to stakeholders.</p> <p>Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing. Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period.</p> | <ul style="list-style-type: none"> ▪ NGOs and civil societies ▪ Other interested parties |
| Focus Group Discussions and Round Table Workshops | Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders. | Project's specific activities and plans, processes that require detailed discussion with affected stakeholders. | <p>Announcements of the Forthcoming meetings are widely circulated to participants in advance.</p> <p>Targeted invitations are sent out to stakeholders.</p> | <ul style="list-style-type: none"> ▪ All project affected parties especially vulnerable groups; ▪ Project delivery agencies ▪ NGOs and civil societies ▪ Relevant Government Ministries and Agencies |
| PCU & SPIUs | 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. | <p>Project-related materials.</p> <p>Any issues that are of interest or concern to the local communities and other stakeholders.</p> | 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. | <ul style="list-style-type: none"> ▪ All project affected parties ▪ Project interests' parties ▪ Other potential stakeholders |
| Non state actors, | Develop and secure clearance processes for timely dissemination of program messages and materials in local languages and in English, where | Project related information, SEA/SH, Nondiscriminatory prohibition messages program impact, benefits | Community outreach / town criers dedicated Toll-free telephone lines, fliers and town hall meeting | <ul style="list-style-type: none"> ▪ All project affected parties ▪ Project interests' parties |

| Method / Tool | Description and Use | Contents | Dissemination Method | Target Groups |
|------------------------------|---|---|---|--|
| | relevant, for timely dissemination of messages and materials and adopt relevant communication channels | and available feedback channels | adhering to NCDC and state applicable COVID-19 protocol. | <ul style="list-style-type: none"> Other potential stakeholders |
| National / State Legislators | getting issues on to the policy agenda, Public opinion, generating endorsement and awareness of programmes Change (or no change) in policy content | Preparing briefs for policymakers, on updates and performance scorecard | <ul style="list-style-type: none"> Face to face meetings Meetings with elected officials in communities surrounding programme. Meetings with officials Press conferences Interviews (media traditional and digital) Social Media Strategy Digital PR | <ul style="list-style-type: none"> Project interests' parties Other potential stakeholders |

4.2 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 public at the following locations:

- Federal Ministry of Finance Budget and National Planning
- State Ministries of Finance
- Federal Project Coordinating Unit
- Other designated public locations to ensure wide dissemination of the materials.

Electronic copies of the SEP will be placed on the website of the World Bank and each implementing agency. 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 disclosed materials to state and national NGOs, relevant professional bodies as well as other interested parties.

Table 5: 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 ESMP package, and SEP at municipal administrations. Project status reports. Meetings and round tables. |
| Implementing Agencies | Stakeholder Engagement Plan; | Public Notices Consultation Meetings |

| Stakeholder Group | Project Information Shared | Means of communication/ disclosure |
|------------------------------------|---|---|
| | Regular updates on Project development; Additional types of Project's information if required for the purposes of implementation and timeline. | 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. |

05: RESOURCES AND RESPONSIBILITIES

5.1 Introduction

This section describes the proposed organizational structure and management functions for the stakeholder engagement function at the Project. The roles and responsibilities of the organizations are presented below in Table 5.1. The PCU will be responsible for the implementation of the SEP.

Table 5.1: Organizational Roles and Responsibilities

| Role | Responsibility / Accountability |
|--|--|
| National Coordinator | <ul style="list-style-type: none"> Oversee the implementation of the SEP requirements |
| Program Manager | <ul style="list-style-type: none"> Ensure proper implementation and follow up of the SEP. Ensure that capacity building activities across the different implementing agencies and partners are coordinated Ensure the E&S team reports on time and with the expected and agreed points. Provide resources to ensure that interests of stakeholders are represented and taken into consideration during implementation of Project. |
| Environmental and Social Officers | <ul style="list-style-type: none"> Develop, implement and monitor all stakeholder engagement strategies/plans for the Project; Oversee all stakeholder engagement related activities for the Project; Manage the grievance mechanism; Liaise with the Program Manager to ensure that stakeholder engagement requirements/protocols are understood; and Proactively identify stakeholders, project risks and opportunities and inform the Program Manager. |
| Employees (Staff seconded from FMFBNP, other relevant agencies, IVA, Consultants) | <ul style="list-style-type: none"> Comply with requirements stated under this document. Provide assistance if needed to ensure compliance with this plan. Perform assigned tasks towards meeting SEP objectives. Communicate concerns, questions or views to the E&S Officers on implementation of the SEP. Provide data related to SEP performance/monitoring as required. |

5.2 Resources needed

5.2.1 Training

The project will, from time to time, assess the adequacy and capacity of the PCU team members in terms of their understanding of the SEP and GRM put in place for the project and the principles governing the same. Provisions for refresher trainings will be put in place at the commencement of the project effectiveness and annually thereafter.

All parties involved on the SEP will attend a workshop (including virtual options) that will orient everyone about the Project and appraise all individuals of responsibilities and reporting structures.

5.2.2 Financial Resources

The Project will ensure that the budget formulated for the purpose of the stakeholder engagement process and grievance redress is sufficient to meet the expenses of the same.

5.2.3 Budget

The PCU will put in place a standing budget allocated towards the Stakeholder Engagement Program. This is a budget that, as at, when necessary, will be supplemented and/or increased by other budgets related to the activities required for the SEP. Once the project has been finalised, a detailed budget for the implementation of this SEP will be provided and this will be included in the updated SEP. Annex 1 has an initial budget estimate.

6.0 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 because of poor service delivery, wages/working conditions, employment relations 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 Project 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 if not addressed effectively, may pose a risk.

In compliance with applicable local and national laws and 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 which will be developed to help stakeholders become familiar with the grievance redress channels and procedures. Locked suggestion/complaint boxes will be posted at the PCU, and they will maintain a grievance register to capture and track grievances from submission to resolution and communication with complainants. Project website (and that of the implementing ministry/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.

The PCU indicated that a GRM system is already in place under SFTAS, however, there is need for the GRM to be strengthened, implemented and workable. The GRM will support both Project and the Program operations. Additionally, the SABER Program intend to support capacity building of entities such as SERVICOM and the Public Complaints Commission for effective GRM implementation at state level will be implemented.

6.1 Grievance Redress Mechanism (GRM)

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

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

The GRM will be accessible to all external project stakeholders, including affected people, citizens, civil society, media, and other interested parties.

Stakeholders can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the Project 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 PCU. All grievance that cannot be resolved at PCU shall be allowed to go the court of law for redressal.

6.2 Grievance Resolution Framework

Information about the GRM process will be publicized as part of the initial Project (and Program) consultations and disclosure in all implementing agencies. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project coordinating unit

offices, notice boards available to strategic stakeholders, etc. Information about the GRM process 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 PCU, submitting grievance via email address made available by the coordinating units and via the institutions' websites and collection boxes stipulated for the grievance uptake.
- Step 2: Sorting and processing. The PCU will conduct 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. The PCU would develop and maintain 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 to 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 6.6, or through a court of competent jurisdiction.

A detailed step-by-step outline on the GRM procedure will be included in the Program Operational Manual.

6.3 Grievance logs

The PCU 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).

6.4 Monitoring and reporting on grievances

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

6.5 Point of Contact

Information on the project and future stakeholder engagement programs will be available on the project’s website and will be posted on information boards in the project implementation Unit office. The point of contact regarding the stakeholder engagement program is shown in the box below.

| | |
|--------------------|---|
| Organization: | Federal Ministry of Finance, Budget and National Planning |
| Description: | Contact details |
| Name and position: | Mr Stephen Okon, Director Home Finance Department |
| Address: | Federal Ministry of Finance Budget and National Planning, 816 Ahmadu Bello way, Central Business District, Abuja, FCT |
| E-mail: | xxxx |
| Telephone: | xxxx |

6.7 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.

7.0 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. As indicated in Chapter one, this version of the SEP should be looked at as the first version. Revisions are to be made in the plan periodically revised and updated as necessary during capacity building and project implementation to ensure that the information presented 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.

7.1 Reporting

Quarterly 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.

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.
- Several 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 state, and national media.

8.0 Further consultations

Further Consultations will be carried out as outlined in the Environmental and Social Commitment Plan (ESCP) developed for this project.

9.0 REFERENCES

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

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

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

Annex 1: Proposed Budget Line Items for Stakeholder Engagement

| Item | Expected Participants | Frequency | Estimated unit cost | Total (US\$) |
|---|-----------------------|-----------|---------------------|--------------|
| Stakeholder Engagement across the participating states* | 36+1 | Quarterly | Lump sum | Lumpsum |
| Virtual online meetings/ internet with project stakeholders and Project counterparts* | 50 per state | Quarterly | Lump sum | 1,000.00 |
| Primary Stakeholders meeting * | 40 | 2 | 2,000 | 4,000.00 |
| Production of Newsletter* | | | | 13,200.00 |
| Project information kit* | | | | |
| Miscellaneous (Printing etc.) | | Lump Sum | 8,000 | 8,000.00 |
| Toll free number* | | Lump sum | | 5,600.00 |

*For efficiency reasons, these activities are expected to both cover the IPF Component and the Program-for-Results of the Operation.

Annex 2: Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings March 20, 2020

With the outbreak and spread of COVID-19, people have been advised, or may be mandated by national or local law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Countries have taken various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings.

These restrictions have implications for World Bank-supported operations. In particular, they will affect Bank requirements for public consultation and stakeholder engagement in projects, both under implementation and preparation. WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

This Note offers suggestions to World Bank task teams for advising counterpart agencies on managing public consultation and stakeholder engagement in their projects, with the recognition that the situation is developing rapidly and careful regard needs to be given to national requirements and any updated guidance issued by WHO. It is important that the alternative ways of managing consultation and stakeholder engagement discussed with clients are in accordance with the local applicable laws and policies, especially those related to media and communication. The suggestions set out below are subject to confirmation that they are in accordance with existing laws and regulations applying to the project.

Investment projects under implementation.

All projects under implementation are likely to have public consultation and stakeholder engagement activities planned and committed as part of project design. These activities may be described in different project documents and will involve a variety of stakeholders. Commonly planned avenues of such engagement are public hearings, community meetings, focus group discussions, field surveys and individual interviews. With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Taking into account the importance of confirming compliance with national law requirements, below are some suggestions for task teams' consideration while advising their clients:

Task teams will need to review their project, jointly with the PMUs, and should:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations.
- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders (international, national, local) etc.
- Assess the level of risks of the virus transmission for these engagements, and how restrictions

that are in effect in the country / project area would affect these engagements.

- Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines. For example, selection of resettlement options by affected people during project implementation. Reflecting the specific activity, consider viable means of achieving the necessary input from stakeholders (see further below).
- Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, task teams should discuss and agree with PMUs the specific channels of communication that should be used while conducting stakeholder consultation and engagement activities. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, zoom and skype;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, such as would be the case for Resettlement Action Plans or Indigenous Peoples Plans preparation and implementation, identify channels for direct communication with each 3 affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
- An appropriate approach to conducting stakeholder engagement can be developed in most contexts and situations. However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, the team should discuss with the PMU whether the project activity can be rescheduled to a later time, when meaningful stakeholder engagement is possible. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.

Investment projects under preparation. Where projects are under preparation and stakeholder engagement is about to commence or is ongoing, such as in the project E&S planning process, stakeholder consultation and engagement activities should not be deferred, but rather designed to be fit for purpose

to ensure effective and meaningful consultations to meet project and stakeholder needs. Some suggestions for advising clients on stakeholder engagement in such situations are given below. These suggestions are subject to the coronavirus situation in country, and restrictions put in place by governments. The task team and the PMU should:

- Review the country COVID-19 spread situation in the project area, and the restrictions put in place by the government to contain virus spread;
- Review the draft Stakeholder Engagement Plan (SEP, if it exists) or other agreed stakeholder engagement arrangements, particularly the approach, methods and forms of engagement proposed, and assess the associated potential risks of virus transmission in conducting various engagement activities;
- Be sure that all task team and PIU members articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings, and minimize direct interaction between project agencies and beneficiaries / affected people;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, zoom and skype meetings;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently. Such channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project. WebEx, Skype, and in low ICT capacity situations, audio meetings, can be effective tools to design virtual workshops. The format of such workshops could include the following steps:
 - Virtual registration of participants: Participants can register online through a dedicated platform.
 - Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics: These can be distributed online to participants.
 - Review of distributed information materials: Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided. o Discussion, feedback collection and sharing:
 - Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this.
 - Group, team and table discussions can be organized through social media means, such as WebEx, skype or zoom, or through written feedback in the form of an

electronic questionnaire or feedback forms that can be emailed back.

- Conclusion and summary: The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.
- In situations where online interaction is challenging, information can be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp groups, Project web links/ websites, and traditional means of communications (TV, newspaper, radio, phone calls and mails with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.
- Engagement with direct stakeholders for household surveys: There may be planning activities that require direct stakeholder engagement, particularly in the field. One example is resettlement planning where surveys need to be conducted to ascertain socioeconomic status of affected people, take inventory of their affected assets, and facilitate discussions related to relocation and livelihood planning. Such survey activities require active participation of local stakeholders, particularly the potentially adversely affected communities. However, there may be situations involving indigenous communities, or other communities that may not have access to the digital platforms or means of communication, teams should develop specially tailored stakeholder 5 engagement approaches that will be appropriate in the specific setting. The teams should reach out to the regional PMs for ENB and Social Development or to the ESSA for the respective region, in case they need additional support to develop such tailored approaches.
- In situations where it is determined that meaningful consultations that are critical to the conduct of a specific project activity cannot be conducted in spite of all reasonable efforts on the part of the client supported by the Bank, the task team should discuss with the client whether the proposed project activities can be postponed by a few weeks in view of the virus spread risks. This would depend on the COVID-19 situation in the country, and the government policy requirements to contain the virus spread. Where it is not possible to postpone the activity (such as in the case of ongoing resettlement) or where the postponement is likely to be for more than a few weeks, the task team should consult with the OESRC to obtain advice and guidance.