

**Common Market for Eastern and Southern Africa**

**(COMESA)**

**Inclusive Digitalization in Eastern and Southern Africa (MPA)**

**(P502532)**

**DRAFT**

**Stakeholder Engagement Plan (SEP)**

**April 2024**

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# ABBREVIATIONS AND ACRONYMS

|  |  |
| --- | --- |
| AfDB | Africa Development Bank |
| AFE | WB Eastern and Southern Africa region |
| APs | Affected Parties |
| ARICEA | Association of Regulators of Information and Communications for Eastern and Southern Africa |
| ASCENT | Accelerating Sustainable and Clean Energy Access Transformation Program |
| COMESA | Common Market for Eastern and Southern Africa |
| CRASA | Communications Regulators’ Association of Southern Africa  |
| DPI | Digital Public Infrastructure |
| DRC | Democratic Republic of the Congo |
| E&S | Environmental and Social |
| EACO | East African Communications Organization |
| EARDIP | Eastern Africa Regional Digital Integration |
| ESCP | Environmental and Social Commitment Plan |
| EU | European Union |
| FCV | Fragile and Conflict-Affected States |
| GCP | Global Challenge Program |
| GRS | Grievance Redress Service |
| IBRD | International Bank for Reconstruction and Development |
| ICT | Information and Communication Technology |
| IDA | International Development Association |
| IDEA | Inclusive Digitalization in Eastern & Southern Africa |
| ITU | International Telecommunication Union |
| MDAs | Ministries, Departments, and Agencies |
| MPA | Multiphase Programmatic Approach |
| NREN | National Research and Education Network |
| PCU | Program Coordination Unit |
| PCM | Private Capital Mobilization |
| REC | Regional Economic Community |
| RICTAS | Regional ICT Associations |
| RIFF | Regional Infrastructure Investment Facility Project |
| RPSC | Regional Program Steering Committee |
| SAPOA | Southern Africa Postal Operators Association |
| SATA | Southern Africa Telecommunications Association |
| SEP | Stakeholder Engagement Plan |
| TA | Technical Assistance |
| WB | World Bank |

# Project Description

## Project Overview

Inclusive Digitalization in Eastern & Southern Africa (IDEA) is a regional Multiphase Programmatic Approach (MPA) for Eastern and Southern Africa (AFE), which includes three focus areas of : (i) building the foundations for affordable and quality broadband connectivity, data hosting capability, enabling access to digital technology and digital services including (ii) interoperable and safe data platforms and trusted online transactions at national and regional level; (iii) advancing high-impact digitally-enabled applications in priority sectors (with an initial focus on social protection and financial services), digital skills and competencies to increase productive digital usage and enhance economic and social activities.

The MPA sets out an ambitious agenda towards achieving universal digital access in AFE through a programmatic approach comprising key pillars and ‘menu of options.’

## Scope of Activities for COMESA

The Project Development Objective (PDO) for the COMESA operation is to enhance enabling environment for increasing access to and inclusive usage of the Internet and digitally-enabled services in Eastern and Southern Africa. This operation will monitor progress toward the overall Program Development Objective (PrDO) indicators.

**Project Components under the operation with COMESA include:**

**Component 1: Regional Harmonization and Planning Platform (US$4.1 million):** This component aims to enhance the enabling environment for regional digital market development and integration and create a platform to inform and mobilize investments for regional digital infrastructure. Activities under this component include:

* **Regional TA and trainings:** developing regionally harmonized regulatory and policy frameworks, guidelines and standards to promote digital access and usage and promote private sector mobilization for digital infrastructure development and digitally enabled services, applying inclusive and climate smart approaches. It will finance technical and legal consultancies, training and capacity building, including (i) the preparation of a regional Digital Inclusion Action Plan and associated draft regulations and policies covering areas such as digital safeguards, digital literacy, digital financial services etc.; (ii) TA to enhance the implementation of a regional roaming framework and the development of  a regional model to enhance spectrum management; (iii) the development of policy and regulatory guidelines as well as standards to enable and promote the safe use of AI and other emerging technologies, including for climate adaptation, mitigation;  (iv) legal and TA to enable the cross-border flow of data to support cross-border e-commerce; and (v) the development of policy, regulatory frameworks and guidelines at the regional level to enable and promote private capital mobilization for digital infrastructure with recommendations for possible financing facilities and instruments to expand digital access at the regional level, which can be capitalized in future phases of the Program, and where feasible, leveraging applicable financing schemes under ASCENT.
* **1.2 Planning platform and models:** (i) supporting integrated infrastructure planning to cover digital infrastructure and demand for internet connectivity through TA and the development of geospatial mapping tools; (ii) support the development of least cost option to extend Internet access to cross-border areas and priority public entities, such as schools and health clinics, with energy access and climate implications in mind; which can be implemented in subsequent phases at the country or regional level.

**Component 2: Regional Knowledge and Capacity Building (US$2.4 million):** This component aims to support holistic knowledge transfer throughout the program cycle, to build capacity and support institutional strengthening for participating countries in a sustainable manner and to increase the efficiency and impact of the program activities by leveraging regional synergies between countries. Activities under this component include:

* **2.1. Toolkits:** (i) the development of practical tools to support Member States and other countries participating in the IDEA MPA in project preparation and implementation readiness, including (i) the development of templates, draft terms of reference and project management tools for procurement, financial management, budgeting, environmental and social risk and impact management, grievance redressal mechanism; (ii) establishment of a regional monitoring and evaluation (M&E) platform, leveraging innovative data collection and evidence generation at the regional level.
* **2.2. Capacity building, knowledge sharing, trainings for participating countries and COMESA Member States** covering (i) TA to inform the implementation of digital safeguards and the upcoming COMESA’s e-commerce framework; (ii) procurement, financial management, E&S frameworks, quality assurance, data collection and analysis, M&E. It will also support wide knowledge sharing and awareness raising about the Program with communication and results stories, leveraging the 50 million Women African Speak platform under COMESA, in particular to ensure the gender inclusion, and the COMESA Business Council, to support private sector engagement.

**Component 3: Regional Project Coordination and Management (US$3.5 million)**: This component will set up the IDEA’s regional Program Coordination Unit (PCU) to (i) coordinate with participating countries; (ii) validate and report on the Program's results framework (described below in Table 2); and (iii) oversee the implementation of the regional grant to COMESA, including fiduciary, E&S and other functions.

# Objective of Stakeholder Engagement Plan (SEP)

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire program cycle. The SEP outlines the ways in which COMESA Secretariat and its IDEA PCU will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about any activities related to the COMESA IDEA program operations.

# Stakeholder Identification and Analysis

## Methodology

To meet best practice approaches, COMESA will apply the following principles and approach for stakeholder engagement:

* ***Openness and life-cycle approach:*** Public consultations for the program will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, intimidation or discrimination.
* ***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 stakeholder feedback, and for analyzing and addressing comments and concerns.
* ***Inclusiveness and sensitivity:*** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are always encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders’ needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of program benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, people in rural and hard-to-reach communities, and the cultural sensitivities of diverse ethnic groups.
* ***Flexibility:*** If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communications.

## Stakeholder Identification

Stakeholders include individuals or groups that may influence or be impacted by the Program directly or indirectly and those who may have interests in a Program and/or the ability to influence its outcome, either positively or negatively.

The stakeholder identification process establishes which organizations and individuals may be directly or indirectly affected (positively or negatively) by the proposed Program or have an interest in it. To develop an effective SEP, it was necessary to determine exactly who the stakeholders are and understand their priorities and objectives in relation to the COMESA IDEA Program operations. By classifying and analyzing the stance, influence, capacity and interests of stakeholders, it was then possible to develop an SEP that was tailored to the needs of different stakeholder groups.

COMESA’s IDEA Program stakeholders can be grouped into the following categories:

* Affected Parties(APs);
* Other interested parties (OIPs); and
* Vulnerable and marginalized groups (VMGs).

### Affected Parties (APs)

APsare persons, groups, and other entities within the Program Area of Influence (PAI) that are directly influenced (actually or potentially) by the program and/or have been identified as most susceptible to change associated with the program, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. IDEA Program APs for COMESA IDEA operations are COMESA and other participating Regional Economic Communities (RECs) (SADC, EAC,IGAD,IOC) Member States (Ministries responsible for ICTs and Justice), National Regulatory Authorities (NRAs) , Operators (State owned and Private) COMESA Business Council and Women’s talking platforms, etc. and Consumers of ICTs.

### Other interested parties (OIPs)

OIPs are individuals/groups/entities that may not experience direct impacts from the COMESA’s IDEA Program operations but who consider or perceive their interests as being affected by the program and/or who could affect the program and the process of its implementation in some way. These are: Regional Information and Communications Technology Associations (RICTAS) – Association of Regulators of Information and Communications for Eastern and Southern Africa (ARICEA), Communications Regulators’ Association of Southern Africa (CRASA), East African Communications Organization (EACO), Southern Africa Postal Operators Association (SAPOA), and Southern Africa Telecommunications Association (SATA); European Union (EU);, Africa Development Bank (AfDB), UN Agencies e.g., UNICEF, etc., other donors, International Telecommunication Union (ITU), National Research and Education Networks (NRENs), Organizations representing women and girls, etc.

### Vulnerable and Marginalized Groups (VMGs)

VMGs are persons who may be disproportionately impacted or further disadvantaged by the Project(s) 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 decision-making processes associated with the project. Examples of VMGs for ICT projects are Women-owned ICT businesses, Youth, women and youth in business expected to use digital platforms, Cross-border communities, Internally Displaced Persons (IDPs), Refugees, Minority and marginalized groups e.g., indigenous people, etc., People with disabilities (PWDs), and women without digital literacy and access to digital devices, digital platforms and digital services.

Since COMESA will work with governments and other digital partners implementing Program activities, and will not be working directly with local communities, no disadvantaged and vulnerable groups are expected to be engaged directly by COMESA. Such engagements will be undertaken at the country level, based on country specific SEPs, and by the country governments. Results will nevertheless be made available to COMESA. COMESA also will ensure that women’s concerns and perspectives are included in their communications and other project-related activities.

| Stakeholder Groups | Stakeholders | Relevance to COMESA IDEA Operations |
| --- | --- | --- |
| General Member States | Authority | The Authority consists of Heads of State or Government of the Member States and is responsible for the general policy, direction and control of the performance of the executive functions of the Common Market and the achievement of its aims and objectives.  |
| Council of Ministers | The Council is composed of Ministers designated by the Member States. The Council is responsible for ensuring the proper functioning of COMESA in accordance with the provisions of the Treaty. The Council takes policy decisions on the programs and activities of COMESA, including the monitoring and reviewing of its financial and administrative management. |
| Meeting of Ministers in Charge of Transport and Communications, Information Technology and Energy | Meeting of Ministers is composed of Ministers in charge of Transport, Communications, Information Technology and Energy. The meeting makes policy decisions on issues to do with infrastructure. |
| National Ministries, Departments and Agencies (MDAs), including NRAs | MDAs in charge of ICT | Will receive IDEA TA, per government requests.Spearhead respective country participation in the ProgramBenefiting individual states |
| Private sector companies in supported countries | ICT companies in supported countriesCOMESA Business Council | Beneficiaries of the project |
| International partners | World BankOther multilateral and bilateral donors | Financiers of the program and related initiatives in ICT sector Possess knowledge of E&S management, stakeholder engagement. |
| EU, AfDB, UNICEF, ITU, AU | Supports review and/or development of various regional policy and regulatory frameworks in a harmonized manner that will contribute to enhancing competition, improved access to cost effective and secure ICT services in the AFE and Indian Ocean region.Sign MoUs to collaborate on mutual objectives. |
| Regional Associations | RICTAs | Will play a critical role in (i) establishing a regional policy compact to inform sector reforms and facilitate public private dialogue across the region towards Private Capital Mobilization (PCM), (ii) developing regionally harmonized frameworks, guidelines and standards to promote digital access and usage, and (iii) supporting integrated infrastructure planning. |
| Regional Economic Communities | EAC, SADC, IOC, IGAD | COMESA collaborates with them.Regional community development organizations.Key in establishment of regional policies and frameworks.  |
| Other interested organizations | Organizations supporting womens’ and girls’ access to digital services | Provide support and collaboration for improving womens’s and girls’ access to digital services |
| NRENs | Specialised internet service providers dedicated to supporting the needs of research and education communities within a country. Usually distinguished by support for high-speed backbone networks, offering dedicated channels for individual research projects |

## Stakeholder Mapping

It is important to tailor the engagement methodology to the targeted stakeholders and their relationship to the COMESA IDEA Program operations (i.e. their influence and interest). Stakeholder mapping seeks to understand stakeholders’ level of interest in the Program and influence in decision making as well as on other Program stakeholders and will continue throughout the Program lifecycle. It is also important to note that stakeholder interests and level of influence is dynamic and changes over time; hence the need to periodically update the stakeholder map as well as the wider SEP. Mapping will also help identify stakeholders who may find it more difficult to participate in consultation activities and are affected by or interested in the proposed Program because of their marginalized or vulnerable status (such as disabled or elderly people).

Stakeholder mapping considers:

* Who is affected by the COMESA’s IDEA Program operations and activities;
* Who are the formal and informal community leaders and to what degree they are seen as representative;
* Whether the stakeholder supports, is neutral towards, or is opposed to the Program;
* Each stakeholder’s interests and concerns in relation to the Program; and
* How different stakeholders can influence the Program and what risks or opportunities this presents.

According to each stakeholder’s levels of interest or impact on the program, different levels of engagement intensity will be employed. Stakeholders have been mapped using the matrix presented in below.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Level of Interest** | **High** | Other Donors | EURICTAsSupported private sector companiesITUNRENsOrganizations supporting womens’ and girls’ access to digital services | Ministers in Charge of Transport & Communications, Information Technology & EnergyMDAs, NRAs |
| **Medium** | AUUN Agencies | World Bank | COMESA Council of MinistersSADCEACIGAD |
| **Low** |  | AfDB | COMESA AuthorityRECs (COMESA, SADC, EAC, IOC, IGAD) |
|  |  | **Low** | **Medium** | **High** |
|  | **Level of Influence** |

# Stakeholder Engagement Process

## Summary of Stakeholder engagement done during project preparation

Development partners have been consulted throughout project preparation to ensure coordination. Consultations included technical discussions with development finance institutions, notably the Horn of Africa Initiative Secretariat, AfDB on its Horn of Africa Digital Integration Project, the EU on its Initiative for Digital Government and Cybersecurity and missing broadband links initiative, the International Telecommunication Union (ITU) on its support for affordable access to broadband, Smart Africa’s proposed internet bulk internet capacity purchase program, the GIGA initiative (ITU and UNICEF) on infrastructure mapping for the education sector, the EU AfricaConnect program for National Research and Education Networks (NRENs) and private sector consultations held, inter alia, during the Mobile World Congress event in Barcelona, February 2024.

## Stakeholder Engagement Plan

### Objectives of the Stakeholder Engagement Plan

As noted earlier, the primary objective of this stakeholder engagement plan is to define a program for two-way stakeholder engagement, including public information disclosure and consultation throughout the entire program cycle. The SEP defines the stakeholder engagement requirements for the Program and how information will be shared. The SEP should be coordinated with other COMESA initiatives for communications and outreach, and should include the following:

* Information that will be communicated including the level of detail and format;
* How the information will be communicated – face to face meetings, in email, telephone, web portal, WhatsApp, radio and television, newsletters, newspapers, video, posters and flyers, etc.
* When information will be distributed, the frequency of Program communication, both formal and informal;
* Who is responsible for communicating Program information;
* Communication requirements for all Program stakeholders;
* How sensitive or confidential information is communicated and who must authorize this;
* How changes in communication or the communication process will be managed;
* Any constraints, internal or external, which may affect Program communication; and
* The escalation process for resolving any communication-based conflicts or issues.

### Key Issues that should be communicated

The following are some of the important messages that will be communicated to the Stakeholders:

* Background of the Program;
* Program Description;
* Program Activities;
* The potential Program benefits and impacts;
* The process that will be followed to engage with stakeholders;
* The Grievance Mechanism (GM) for the Program; and
* How and when stakeholders can participate in the Program.

### When to communicate

Stakeholder Engagement will be structured and offered regularly but with the flexibility of responding to issues as they emerge. Broadly, stakeholder engagement for the proposed Program has been categorized into preparation and operation engagement activities.

### Communication Methods

A variety of communication methods are used to engage with stakeholders reflecting their level of authority, socio-economic context, and cultural and intellectual factors such as level of education and literacy, and language capabilities.

English, French, and Arabic are the official languages of the Common Market. Portuguese will also be included for lusophone country participants. Therefore, all COMESA stakeholder engagements will be tailored to respective countries’ official languages. For official meetings and communication, English will be the main mode of communication given that it is the most widely accepted language for business, but as necessary COMESA will make efforts to also communicate through the other Common Market languages and to translate communication documents to those languages as necessary.

### Summary of project stakeholder needs and methods, tools, and techniques

Table 1 shows a summary of program stakeholder information needs.

Table 1: Summary of Project Stakeholder Information Needs

| Stakeholder group | Stakeholder | Language needs | Preferred communication method(s)  | Specific needs  |
| --- | --- | --- | --- | --- |
| General Member States | Authority (Head of State or Government | English, Portuguese, French, and Arabic | Formal meetingsStructured agendasEmail communication  | Program information document (PrID) and ESCP. |
| Council of Ministers | English, Portuguese, French, and Arabic | Formal meetingsStructured agendasEmail communicationLetters | Program roles and responsibilities, planned stakeholder engagements, information generation and dissemination. Regular formal and informal meetings  |
| Meeting of Ministers in Charge of Transport and Communications, Information Technology and Energy | English, Portuguese, French, and Arabic | Formal meetingsStructured agendas | Program roles and responsibilities, planned stakeholder engagements, information generation and dissemination.  |
| National MDAs including NRAs | MDAs in charge of ICT | English, French, Portuguese and Arabic | Formal meetingsWebsite | Sensitization on IDEA MPA and its outcomes and how to access program benefits and support from COMESA. |
| Private sector companies in supported countries | ICT companies in supported countriesCOMESA Business Council | English, French, Portuguese and Arabic | Regular formal and informal meetingsWebsite | Information on project products and services and how to access them. |
| International partners | World BankOther donorsEU, AfDBUNICEF, ITU | English, French, Portuguese and Arabic | Email, telephone calls, meetings (in person or virtual) Structured AgendasWebsite | Program progress in relation to preparation, implementation,stakeholder engagement, joint control and management efforts, experience sharing, grievances received and how they are being handled and resolved.Regular formal and informal meetings. Sign MoUs to collaborate on mutual objectives. |
|  | RICTAs | English, French, Portuguese and Arabic | Regular formal and informal meetingsWebsite | Sensitization on IDEA MPA and its outcomes. |
| Regional Economic Communities | EAC, SADC, IGAD | English, French, Portuguese and Arabic | Formal meetingsWebsite | Sensitization on IDEA MPA and its outcomes. |
| Other interested organizations | Organizations supporting womens’ and girls’ access to digital services | English, French, Portuguese and Arabic | Formal meetingsStructured agendasWebsite | Sensitization on IDEA MPA and its outcomes. |
| NRENs | English | Regular formal and informal meetingsWebsite | Sensitization on IDEA MPA and its outcomes. |

##

Table 2 Stakeholder Engagement and Disclosure Methods

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Program Stage | Information to be disclosed | Target stakeholders | Communication channels | Timetable  | Responsibilities  |
| Program preparation | Program documents – ESCP, SEP. | COMESA | Email, intranet, trainings, meetings, website | In person or virtual Within three months after program effectiveness  | COMESAWorld Bank |
| Affected and interested parties | Email, website, meetings (in person or virtual)  |
| Annual workplan | Affected and implementing parties | Email, website, press | Two (2) weeks after approval by the World Bank  | COMESA |
| Program operation manual | COMESA | Email, website, meetings (in person or virtual) | Within three months of program effectiveness | COMESA |
| Program implementation and monitoring | Program progress reports | All stakeholders | Email, website, meetings, press | In person or virtual meeting; bi-annually | COMESA |

Table 3: Stakeholder Consultation Plan

| Program Stage | Target stakeholders  | Topic of consultation | Method used | Location/ frequency | Responsibilities  |
| --- | --- | --- | --- | --- | --- |
| Program preparation | COMESA Council of Ministers | Development, approval and disclosure of ESF, ESCP, SEP, program information document (PrID), Annual Workplan | Email, meetings | In person or virtual and continuous | COMESA |
| COMESA Member states, Authority, Meeting of Ministers | * Program documents - ESF, PrID, ESCP, and LMP requirements.
* Program scope and rationale
* Grievance mechanism process
* Annual workplan
 | Email, meetings, trainings (for the PCU)  | Virtual and physical Periodic Daily, quarterly (for the PCU)  | COMESA |
| COMESA Secretariat, PCU |
| Media | Project scope and rationale  | Press release | Once | COMESA |
| Program implementation and monitoring | COMESA member states and Secretariat Supported private sector companies, Organizations supporting womens’ and girls’ access to digital services,World Bank, RICTAs, NRENs, EAC, IGAD, SADC, EU, AfDB, ITU, AU, UNICEF, etc.  | * Project status and progress.
* Establishing a regional policy compact
* Development of regional guidelines for digital access and usage that are gender-inclusive and climate-smart
* Establishment of a platform for integrated infrastructure planning
* Countries supported through capacity building, repository of tools and knowledge exchange.
 | Email, meetings, trainings, surveys/ research. | Virtual and physical as needed.  | COMESA |
| Media | Visibility for the program (coordinated with other COMESA communications and outreach initiatives) | Email, meetings | Virtual and physical, as needed | COMESA |

## Timelines

Stakeholder consultations will be conducted throughout the program’s lifecycle for all key stakeholder groups as indicated in the tables above. Consultations will be conducted during program preparation, implementation and monitoring processes.

COMESA Secretariat and PCU will actively utilize its international platform to conduct meaningful engagements with all stakeholders within 6-12 months of program effectiveness. Among these is Council of Ministers that will endorse documents and review project progress and approve short to long-term work plans. The SEP shall then be updated with the outcomes of this engagement process.

## Review of Comments

The PCU will maintain open lines of communication with all stakeholders to encourage information flow-including feedback, understanding of the program and its key documents and to strengthen working relationships.

Comments from stakeholders will be gathered through email, social media, during meetings-both formal and informal- and included in periodic program reports as necessary. Response to the comments will be done directly to the individual(s) or through email, meetings or reports.

# Resources and Responsibilities for Implementing Stakeholder Engagement Activities

## Resources

The PCU for IDEA at COMESA Secretariat will oversee all stakeholder engagement activities. A preliminary budget is shown below which will be adjusted as the IDEA project begins operations. This table identifies activities intended to meet WB ESF SEP requirements, but some activities could be part of a broader communications and outreach budget.

Key objectives of a SEP which are different from a standard communications budget are 1) to ensure two-way communication between project and its stakeholders (i.e. not just one-way public relations messages), and to ensure SEP-related activities, including GM will receive necessary funding in annual budgets.

The following assumptions were used for this draft budget:

1. Consultation meetings (prior effectiveness) – the assumption is that COMESA will hold at least 5 meetings with different stakeholders to disclose the contents of the SEP. The $5,000 caters for IEC materials, refreshments and other costs incurred when organising the meetings;

2. Consultation meetings (after effectiveness) – 4 meetings annually for six years with stakeholders to disclose any new information on the SEP and also report on the progress implementation of the project. The $5,000 caters for training stakeholders in the SEP (to ensure two-way communications between project and its stakeholders (i.e. not just one way public relations messages), and to ensure SEP-related activities, including GM, will receive necessary funding in annual budgets, production of IEC materials, refreshments and other costs incurred when organising the meetings;

3. Updating SEP and monitoring – SEP is a living document, stakeholders and their interests change, as such the document has to updated from time to time (at least once a year). Monitoring implementation of the SEP is equally important. The allocated budget covers the costs of any meetings held to update the SEP and also facilitation for any monitoring visits.

4. GM – the lumpsum budget is for production of IEC materials, processing, investigation, and resolution on filed grievances. Meetings, investigation and communication costs.

 Table 5‑1 presents a list of proposed costed activities for the implementation of the SEP and an estimated budget.

Table 5: Estimated Stakeholder Engagement Budget

| No. | Activity  | Number  | Unit Cost (US$) | Number of years  | Total costs  |
| --- | --- | --- | --- | --- | --- |
|  | Consultation meetings (Prior to project effectiveness) | 5 | 5,000.00 | 1 | 25,000.00 |
|  | Consultation meetings (After project effectiveness) | 4 | 5,000.00 | 6 | 120,000.00 |
|  | Updating SEP and monitoring | - | Lumpsum | Lumpsum | 20,000.00 |
|  | Grievance mechanism  | - | - | Lumpsum | 50,000.00 |
|  | Total  |  |  |  | **215,000.00** |

## Responsibilities

All program staff will play a key role in the consultation processes through their interaction with the different stakeholders. However, with supervision from the Project Coordinator, the Social Specialist and Stakeholder Engagement/Communication Officer will have the lead responsibility for implementing this SEP and updating it as needed.

# Grievance Mechanism

## Introduction

IDEA MPA will adopt and strengthen the ASCENT grievance mechanism (GM). The GM which comprises a set of arrangements will enable all stakeholders to raise grievances and seek redress when they perceive a negative impact arising from the program activities including cases linked to sexual exploitation and abuse and sexual harassment (SEA/SH). It is a keyway to mitigate, manage, and resolve potential or realized negative impacts, as well as fulfill obligations under international laws and contribute to positive relations with all stakeholders.

## GM Objectives

The GRM is intended to:

1. To receive, log, analyze and address complaints and grievances and enhance conflict resolution arising during project implementation, while keeping complainants informed of the progress being made to resolve the grievances.
2. Ensure transparency, accountability and non-discrimination throughout the implementation of program amongst the relevant stakeholders including project beneficiaries.
3. Resolve any emerging ESHS grievances in the project.
4. To promote relations between the program implementers, executers and beneficiaries.
5. Provide avenue for vulnerable groups and survivors of SEA/SH to have equal access to grievance redress, while ensuring that SEA/SH grievance response mechanisms are survivor centred.

## Awareness

GRM will be widely publicized among stakeholder groups such as the affected parties, e.g., COMESA member states, MDAs, COMESA staff, RICTAs, IGAD, EAC, SADC, etc.

## Implementing Steps

The process of implementing the GM involves the following steps:

1. The complaint submitted to Project Coordinator or designated Grievance Management Focal Point:
* By email;
* By cellphone;
* By letter;
* Face-to-face person; and
* Anonymously
1. The PCU through the Focal Point will register the complaint and acknowledge receipt. An anonymous complaint should be investigated and handled in a confidential manner.
2. The PCU will review the complaints and decide whether they will be processed.
3. The complainant will be notified of the case status.
4. The PCU will request additional information if required.
5. The complaint(s) will be assessed, and a response will be formulated.
6. The proposed solution will be communicated to the complainant within 15 working days from the receipt of the complaint.
7. If the solution is acceptable to the complainant, then PCU will implement the solution(s) and settle the issue(s).
8. If the solution is not acceptable to the complainant, then the PCU will escalate raised the issue to management within COMESA.

## GM Evaluation System

PCU will assess the overall effectiveness and the impact of the mechanism annually and the results will contribute to improving the performance of the GRM and provide valuable feedback to program management. The following questions can be addressed in such evaluations:

1. How many complaints have been raised? How many complaints were raised by women and men? What is the gender of the alleged perpetrators?
2. What types of complaints have been raised?
3. What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, action being implemented, or resolved)?
4. How long did it take to solve the problems?
5. How many aggrieved parties have used the grievance redress procedure?
6. What were the outcomes?

# Monitoring and Reporting

## Monitoring

Monitoring the stakeholder engagement activities is important to ensure that consultation, disclosure, and grievance management efforts are effective and that stakeholders have been meaningfully consulted throughout the process. Monitoring also allows the Program to improve its strategies by using information acquired from the monitoring activities. The Program will monitor the stakeholder engagement activities and in particular:

* The implementation of the SEP;
* The effectiveness of the engagement process in managing impacts and expectations by tracking responses received from engagement activities;
* Consultations and disclosure activities conducted with stakeholders; and
* All grievances received and resolved whether anonymous or non-anonymous.

Performance will be evaluated bi-annually by tracking:

* Place and time of formal engagement events and level of participation by specific stakeholder categories and groups with due consideration for gender disaggregated (e.g., participation in engagement events, etc.);
* Numbers and type of grievance and the nature and timing of their resolution;
* Materials disseminated, i.e., type, frequency, and location;
* Number of comments by issue/ topic and type of stakeholders, and details of feedback provided; and
* Community attitudes and perceptions towards the Program based on media reports and stakeholder feedback.

## Reporting

The PCU will develop on behalf of COMESA regular reports (typically quarterly) which will typically be required by the World Bank. The reports will present all activities, including stakeholder engagement activities, for the period and summarize the issues. The report and its annexes will also detail the measures taken to address the issues, timeline of responses, as well as corrective and mitigation measures to address grievances and analysis of trends. Data reported on will include the following activities:

* Information distribution of disclosure materials;
* Public announcements and engagement of media; and
* Disclosure and consultation meetings; and collection and incorporation of comments and feedback.

The SEP will be periodically revised and updated as necessary to ensure that the information and the methods of engagement remain appropriate and effective in relation to the program context. Any major changes to the program related activities and to its schedule will be duly reflected in the updated SEP. Quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventive actions will be collated by responsible staff and referred to the senior management of the program.

The quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the program’s ability to address those in a timely and effective manner. The program team will conduct surveys on World Bank supported components at the entry, mid-point and end of the program. The results from these surveys will be used to inform the World Bank on the necessary steps to take towards meeting the SEP objectives and program goals.

# Annexes

## Annex 1: Template to Capture Consultation Minutes

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Stakeholder (Group or Individual) | Dates of Consultations | Summary of Feedback | Response of PCU | Follow-up Action(s)/Next Steps | Timetable/ Date to Complete Follow-up Action(s) |
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## Annex 2: Complaints form

1. Identity & Contact Details

|  |  |  |
| --- | --- | --- |
|  | Complainant | Representative (If Applicable) |
| Title (Mr/Ms/Mrs) |  |  |
| Name |  |  |
| Age |  |  |
| Marital Status |  |  |
| Education level |  |  |
| Organization |  |  |
| Address |  |  |
| Country |  |  |
| Province/District |  |  |
| Telephone |  |  |
| Email |  |  |
| Language |  |  |
| Should we send correspondence to you or your representative? |  |  |

1. Are you requesting for confidentiality for the information?

 Yes No

1. Is there any fear/risk of retaliation or attack or victimization?

 Yes No

1. Which institution or officer/person are you complaining about?

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1. Have you reported this matter to any other COMESA institution?

 Yes No

1. If yes, which one?

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1. Has this matter been the subject of court of justice proceedings?

 Yes No

1. Please give a summary of your complaint and attach all supporting documents [Note to indicate all the particulars of *what* happened, *where* it happened, *when* it happened and by *whom*]

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1. What action would you want to be taken?

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Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

## Annex 3: SEA/SH Intake and Referral Form

Name of complainant: ..........................................................................................................

Nationality: ..........................................................................................................

Address/Contact Details: ..........................................................................................................

Position (if applicable): ...................................... Age: ..................................... Sex: ..................................

Name of victim/survivor (if different from complainant): .............................................

Address/Contact Details: .........................................................................................................

Age: .................................. Sex: .................................. Nationality: ..................................

Name (s) & address of parents/legal guardian, if under 18: .................................................................................................................................................................. .................................................................................................................................................................. ..................................................................................................................................................................

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Has survivor given consent for completion of this form? YES NO:

Is the victim/survivor a beneficiary/receiving any type of humanitarian assistance? (Name the organization/agency aiding):

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Location of alleged incident (s): .................................

Date: ................................. Time: .................................

Physical and emotional state of the victim/survivor (Describe any cuts, bruises, lacerations, behaviour and mood, etc.):

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Witness’ Name & Contact Information:

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Description of incident (Please use separate sheet of paper if necessary):

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Briefly describe service provided to survivor:

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Briefly describe if there will be need for medium and long-term victim assistance:

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Any other pertinent information provided during interview? (Including contact made with other organizations if any):

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Signature/thumbprint signaling that the complainant been informed about organizations procedures for dealing with complaints:

Name of Accused Person (s): ................................. Job title: .................................

Organization Accused Person (s) Works for: ......................................................................................

Address of Accused Person: ......................................................................................

Age: ................................. Sex: .................................

Physical Description of Accused Person:

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Is the perpetrator a continuing threat to the safety of the survivor, complainant, staff or any beneficiary? Please explain any safety concerns:

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Has any disciplinary action been taken by the responsible agency? (Describe):

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Report Completed by: ................................................................. Date/Time: .........................................

Position/Organization: ......................................................................................

Location: ......................................................................................

Date Report forwarded to relevant management structure: ..................................................................

Date received relevant management structure (Name/Position/Signature): ........................................

## Annex 4: Grievance Monitoring and Tracking Log (for non-SEA/SH Complaints)

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Case no. | Date Claim Received | Name of Person Receiving Complaint | Where/how the complaint was received | Name & contact details of complainant (if known) | Type of Claim Add content of the claim (include all grievances, suggestions, inquiries)\*Please note if the complaint was related to the program. If not, note it here and refer complainant to PCU for further processing. | Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication & by whom) | Expected Decision Date | Decision Outcome(include names of participants and date of decision) | Was Decision communicated to complainant? Y/NIf yes, state when, by whom and via what method of communication  | Was the complainant satisfied with the decision? Y/N State the decision.If no, explain why and if known, will pursue appeals procedure.  | Any follow up action (and by whom, by what date)? |
|  |  |  |  |  |  |  |  |  |  |  |  |
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