REPUBLIC OF GHANA

GULF OF GUINEA NORTHERN REGIONS SOCIAL COHESION PROJECT (SOCO)

STAKEHOLDER ENGAGEMENT PLAN

DECEMBER 2021

LIST OF ACRONYMS

CRC	Committee for Regional Coordination
DA	District Assembly
ESS	Environmental and Social Standards
FCV	Fragility, Conflict and Violence
GDP	Gross Domestic Product
GoG	Government of Ghana
GPSNP	Ghana Productive Safety Net Project
GM	Grievance Mechanism
LG	Local Government
MLGDRD	Ministry of Local Government Decentralisation and Rural Development
NTC	National Technical Committee
PAP	Project Affected Persons
PIU	Project Implementation Unit
POC	Project Oversight Committee
PTC	Project Technical Committee
RCC	Regional Co-ordinating Council
SEA/SH	Sexual Exploitation and Abuse/ Sexual Harassment
SEP	Stakeholder Engagement Plan
SOCO	Gulf of Guinea Northern Regions Social Cohesion Project

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1.0   INTRODUCTION
1.1   Background/Project Overview

The Government of Ghana (GoG), through the Ministry of Local Government Decentralisation and Rural Development (MLGDRD) in collaboration with the Ministry of Finance and the World Bank, is preparing to implement the Gulf of Guinea Northern Regions Social Cohesion Project (SOCO, P175043). Within the target Gulf of Guinea countries (namely, Benin, Côte d'Ivoire, Ghana, and Togo), there is a growing realisation of the risks posed by regional fragility, conflicts, and violence (FCV) dynamics and that regional cooperation is necessary in ensuring effective investments locally, but also to improve regional dialogues, to stem their further expansion. Thus, the proposed regional operation seeks to facilitate coordination of local investments especially around border areas, including cross-border investments, and information sharing across countries and support the adoption of coherent and consistent regional approaches to problems of connectivity, social exclusion and cohesion that are shared across the sub-region.

The project seeks to contribute to the prevention of conflict spillover by improving social and economic resilience of the target northern regions and to strengthening regional dialogue across the Gulf of Guinea countries.

Ghana economy has seen a gradual transformation in terms of the contribution of the various sectors to its GDP. The Agricultural sector which used to be the leading contributor to the nation's GDP has now been overtaken by the service sector. Some scholars have argued that that structural change in Ghana's economy had been characterised by a decline in the agricultural sector's share in employment, but the released labour ended up in relatively low productivity and informal sectors. Hence, although structural change has contributed to productivity growth in Ghana, the impact has been largely muted. Despite the transformation seen in the sectoral contribution to GDP, agriculture remains the predominant preoccupation, especially of most inhabitants in the northern sector of Ghana.

Climate change, manifested in Ghana through: (i) rising temperatures, (ii) declining rainfall totals (iii) rising sea levels and (iv) high incidence of weather extremes and disasters, thus, threatens the livelihoods of the inhabitants of the country. This also has food security implications for the country. Climate change is also expected to amplify the high variability in rainfall already experienced in the West African sub-region. The social implications of climate change include - changes in land tenure arrangements and social relations, migration, and subsequent urban and rural vulnerability.

Similar to the other Gulf of Guinea countries, the vulnerability of the target regions in Ghana to climate change is further heightened by the historically low level of development (poor access to basic services and markets, higher average poverty rate, long periods of annual dry season, etc) and the frequent conflicts experienced by some communities. The agglomeration of these factors has the propensity to engender a feeling of neglect, and exclusion from the national development agenda, particularly among the youth. A vulnerability assessment was conducted as part of project preparation - based on a combination of publicly available and government data - to further target districts in the 6 northern regions of Ghana – Upper East, Northeast, Upper West, Northern, Savannah, and Oti - that are most vulnerable to FCV and climate risks.

It has been suggested that both the Islamic state group and their rivals in al-Qaeda have taken a strategic decision to make Africa their new priority after suffering setbacks in the Middle East. Social scientists (Gardener, 2021) have suggested that the existing conditions in the Gulf of Guinea region, likely to be aggravated in the future by climate change, will make the youth susceptible to the proclaimed ideals of these insurgents if pragmatic steps are not taken to reverse the trend and prevent what has been forecasted.

Faced with this regional threat, a regional solution has been propounded. It has been suggested that a solely national response is more likely to create divergences across the sub-region in dealing with FCV spillovers from the Sahel especially when there are strong traditional and common cultural aspects that don't have "borders. The spillover of conflict into any one of the Gulf of Guinea countries significantly raises the risks of further instability for others and undermines prevention efforts in the region. It is on this basis that a regional approach has been proposed under this project.

The proposed regional approach involving Côte d'Ivoire, Ghana, Togo, and Benin is expected to among others:

- Enable adoption of coherent and consistent approaches to prevent the common FCV spill-over effects
- Ensure a relatively consistent level of investment in connectivity and access to economic opportunity in each country.

Despite these, the project can also generate potential environmental and social impacts and risks. A key mitigation measure for the potential environmental and social impacts and risks is to prepare a Stakeholder Engagement Plan (SEP) to provide forum and opportunity for engaging stakeholders, addressing their concerns and issues as well as benefiting from their experiences for project sustainability.

1.2   Project Description

1.2.1   Project Development Objective.

The project Development objective is to: "To improve the regional collaboration and socio-economic resilience of border-zone communities in the target Northern regions of the Gulf of Guinea countries exposed to conflict and climate risks."

1.2.2   Project Components

The Gulf of Guinea Northern Regions Social Cohesion Project (SOCO) is community driven development project to be implemented for disadvantaged northern regions of Benin, Cote d'Ivoire, Ghana and Togo. The project will be implemented over a period of five (5) years.

The project has 5 components:

Component 1: Investing in Community Resiliency and Inclusion.

This component will finance local-level investments to promote community resilience and inclusion in border areas. Those community-level investments will be selected and implemented in collaboration with communities, local governments (LGs), and targeted groups who will have received training as part of Component 2. Local investments will be planned and implemented in an integrated manner, with the target areas' medium-term

territorial development objective in mind. The component aims to support people in the target Northern regions to fully participate in their local development activities and to create inclusive and resilient communities with enhanced access to economic opportunities by adapting a community-driven approach complemented by key data and relevant studies that take into account cross-border opportunities and challenges. There are three subcomponents:

Component 1.1: Community investments for strengthening local resilience and inclusion.

This subcomponent will finance community-level public infrastructure in vulnerable village clusters at or near border areas with the aim of preventing regional FCV risks and promoting positive spillovers. Eligible community subprojects include: connectivity (rural roads, culverts, cross-border security infrastructure etc); Wash, Sanitation and Hygiene (Climate-resilient water and sanitation structures, including water reservoirs and water sources, supply pipes, ponds, community water supply system etc), natural resource management and climate adaptation (small irrigation canals, soil and water conservation measures, flood control structures, community pond, tree nurseries, afforestation etc), Energy and ICT (Energy-efficient off-grid electrification; information and communication technology (ICT)-based installations at the community etc.), Social (Rehabilitation or extension of pre-schools, primary school, literacy centres, and social centres etc)

Component 1.2: Strategic economic activity investments for local economic development.

This subcomponent aims to create short-term benefits to existing economic activities, but also to build longer-term economic sources of resilience by investing strategically in targeted local markets. The subcomponent will finance the rehabilitation of existing rural markets, as well as the development of economic activities (services, development of value chains, quality enhancement, aggregation, and so on) linked to the rehabilitation of these markets with the aim of generating local employment and income.

Component 1.3 Youth engagement and social cohesion activities.

This subcomponent will finance youth-identified social cohesion activities and/or cluster-level community infrastructure. The subcomponent will invest in (a) social cohesion activities and events as well as (b) the rehabilitation, upgrading and/or equipment of cluster-level community infrastructure—that are identified and prioritised by the youth.

Component 2: Building foundation and capacity for inclusive and resilient communities

This component will fund a variety of training and capacity-building activities aimed at strengthening the basis and capacity of local stakeholders, particularly in the following four areas: (a) identify and implement subprojects under Component 1, (b) build a foundation for a local economic ecosystem with a cross-border vision that can lead to medium- to long-term territorial development in the target northern region, (c) train targeted youth in border communities to participate in project activities, and (d) promote a better understanding and practice of social inclusion and cohesion.

Communities, LGs, community facilitators, local technical employees of line ministries and partners, as well as a few key national-level stakeholders, will benefit from this component. The component will cover the following types of training and capacity-building activities: Capacity building for community investments to strengthen local resilience and inclusion; Promotion of local economic development; Engaging youth in project-related and more

publicly oriented activities to help inclusion and community cohesion; and Promotion of social cohesion and prevention of violence

Component 3: Regional Coordination Platform and Dialogue

The goal of this component is to improve regional coordination among the four target nations in order to promote a coordinated response to FCV challenges in the Gulf of Guinea. The component will improve national capacity to engage in and co-lead regional dialogue, including advancing a shared vision of the subregion in existing regional institutions such as Economic Community of West African States (ECOWAS), where they will be able to engage and share this vision with border Sahel countries, the Community of Sahel-Saharan States (CEN-SAD), the West African Economic and Monetary Union (WAEMU), or the African Union, among others.

Specifically, it will fund the project's RCP, which will be built around three essential pillars: data collecting and analysis, knowledge generation, and discourse building. Data collecting operations are aimed at improving access to high-quality data and information so that complicated regional and national FCV and climate dynamics can be better understood. Evidence-based analysis will be used to build regional/cross-border policies and inform project implementation through knowledge generating initiatives. The goal of dialogue-building activities is to strengthen regional collaboration by providing a stable and neutral platform for debate, coordination, and planning.

Activities will be implemented to mainstream climate fragility and risks, assisting countries in better understanding the climate change-security nexus and developing appropriate response plans. Other important regional issues, such as transhumance conflicts, cross-border trade, and economic opportunities (including "lessons learned" from the project's financed activities under Components 1 and 2), will be shared and analysed regionally as part of data and research activities, as well as regional dialogues among participating countries. Activities will be phased in order to improve coordination and implementation capabilities over time.

Component 4. Project Management

For the effective implementation of project activities, this component will assist project management and coordination at the regional, national, and subnational levels. The component covers project management areas such as planning, implementation, and technical oversight of program activities; management and monitoring of social and environmental safeguards; overall financial management (FM) and procurement; preparation of work plans, budgets, and progress reports; communication and public awareness campaigns; monitoring and evaluation (M&E) arrangements, including the setup of a management information system (MIS); Setting up and managing a project beneficiary feedback mechanism, as well as steps to improve openness and accountability, including the use of ICT platforms. The development and functioning of a Committee for Regional Coordination (CRC), and for each country - national steering committees (NSCs), and technical national and subnational committees would be aided by coordination activities. The component will fund CRC and PIU staffing costs, as well as national and regional operating expenditures such as equipment, vehicles, fuel, and office space; communications costs; and targeted national and regional capacity building efforts to improve overall project management.

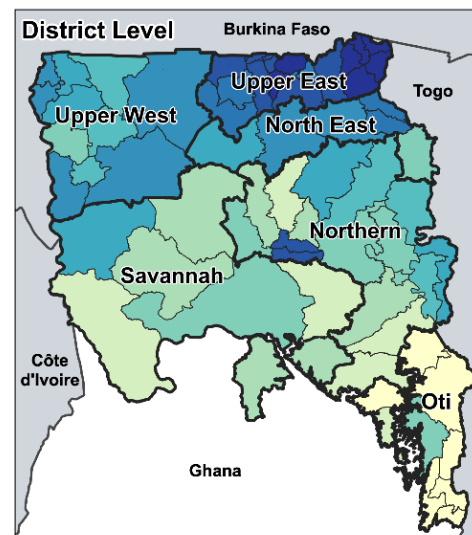**Component 5: Contingent Emergency Response Component.**

This zero-budget component will serve as a contingency funding mechanism that might be activated in the case of a natural or man-made disaster, as well as health crises such as pandemics, via a formal declaration of a national emergency or a formal request from the government. If a disaster or crisis occurs, monies from the unallocated expenditure category or other project components could be shifted to support emergency response expenditures to address immediate demands.

1.3   Project Location

The project activities will be implemented in sixty-three (63) districts located in the following six regions in northern part Ghana: Upper East, Upper West, Savannah, North East, Northern, and the Oti Regions. However, the exact location of the intervention sites which will be covered by the achievements of the Project are still to be determined.

1.4   Scope of the Stakeholder Engagement Plan

The purpose of this document is to establish a stakeholder engagement strategy to guide the Ghana Project Implementation Unit (PIU) of the SOCO Project on its stakeholder engagement. This plan is a 'live' document and may be amended periodically depending on operational changes that may occur and learnings experiences during its implementation. The Plan covers all activities of the SOCO Project from the local sub-project level through the national to international levels and for the entire life of the project.

1.5   Objectives of the Stakeholder Engagement Plan

The overall objective of this SEP is to provide a comprehensive, consistent, and coordinated programme for stakeholder engagement and Project disclosure throughout the 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 project and any activities related to the project. It is further intended to meet the requirements of the Environmental and Social Standard ESS 10 of the World Bank's Environment and Social Framework (ESF) and 'international best practice' approach to engagement that requires the PIU of the MLGDRD 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.

The specific objectives of the Plan are to:

- Identify the project's stakeholders and foster strong relationships with them.
- Through open engagement and expertise, identify the interests, priorities, and level of influence of the different stakeholders identified.
- Build trust and openness both of which are key to successful project implementation

- Make provision for the appropriate project information to be disclosed to stakeholders in a timely, understandable, and accessible manner.
- Describe the methods and tools for stakeholder engagement
- Organise stakeholder consultations, collect their opinions, concerns, and recommendations on risk management and potential environmental and social impacts of the project, and discuss their strong involvement in achieving the expected results of the Project. These consultations must be evidenced by minutes and lists of participants during the information gathering phases (annexed in the SEP)
- Plan the stakeholder consultation and participation strategy taking into account the security and health context, as well as ensure participation of key stakeholders is in accordance with the COVID 19 prevention measures
- Design and establish an effective Grievance Mechanism (GM) in accordance with the requirements of the World Bank's ESS10
- Design and provide a responsive monitoring and reporting framework that will feed the data demands of the different stakeholders, especially at the national level.
- Defining the organisational framework for the implementation of the SEP.

The MLGDRD, represented by the PIU, will achieve the above by:

- Making available all resources required for undertaking "meaningful consultations" and in the actualisation of the plan.
- Ensuring the contents and actions discussed in the SEP are understood by all stakeholders, especially those assigned specific functions.
- Engaging with stakeholders on social, environmental, safety, security, and other relevant project issues through regular, free, prior, and informed consultations.
- Sharing relevant project information in a timely fashion with project's stakeholders.
- Promoting awareness and understanding of the Project's GM among all members of the communities targeted under the project.
- Providing the necessary awareness sessions and training to all relevant stakeholders as well as staff training on stakeholder engagement and GM.

1.6 Methodology for the Preparation of the Stakeholder Engagement Plan

The preparation of this stakeholder engagement plan was carried out as follows:

(i)   Assessment of Project Issues, impacts, risks, and opportunities
(ii)   Identification of stakeholders
(iii)   Consultation with stakeholders
(iv)   Defining objectives
(v)   Development of Grievance Mechanism
(vi)   Development of engagement plan activities and matrix
(vii)   Creation of engagement timelines
(viii) Identification of resources and responsibilities
(ix)   Estimation of cost (Budget)
(x)   Stakeholder validation

(xi)   Finalisation of report and disclosure

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analysing 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 at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly, persons with disabilities, displaced persons, those with underlying health issues, and the cultural sensitivities of diverse ethnic groups.
- *Flexibility*: if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet communication. (See Section 3.2 below).

2.0   REGULATORY AND GOVERNANCE FRAMEWORK

The SEP has been prepared in compliance with the Environmental Assessment Regulations, 1999 (LI 1652), the Ghana Environmental Impact Assessment (EIA) Procedures and the World Bank's Environmental and Social Standards (ESS 10).

2.1   National Regulatory Requirements

2.1.1   1992 Constitution

Article 21(1) (f) of the 1992 Constitution of the Republic of Ghana elevates citizens right to information to a human rights status. There is no better way to respect this constitutional right than to design a mechanism that proactively engages project communities from the project planning phase and to actual implementation and completion.

The *Right to Information Act, 2019 (Act 989),* passed into law in 2019 put into effect the Article 21(10(f) in the Constitution of the Republic of Ghana which states "all persons shall have the right to information subject to such qualifications and laws as are necessary for a democratic society"

Articles 40 to 48 of the Local Governance Act, 2016 (Act 936), mandates local authorities to create opportunities for residents and other stakeholders to access information and to participate in decision making.

2.1.2   Environmental Assessment Regulations, 1999 (LI 1652)/Ghana EIA Procedures.

LI 1652 requires that undertakings likely to have significant impacts on the environment must register with the EPA and obtain environmental permits before commencement of construction and operations. The screening documentation submitted by the proponent should contain information on:
* Details on the proposed activity (including a description of waste generation).
* The proposed location (location, zoning, site description, land cover and topography);
* Infrastructure and utilities.
* Potential Environmental impacts (air quality, biological resources, cultural resources, water quality and hydrology, noise, other impacts).
* Potential Health and safety impacts.
* Management of impacts (air quality, biological resources, cultural resources, water quality and hydrology, noise others).
* Alternatives to the establishment of the activity, and
* List of stakeholders consulted (including evidence)

For large scale projects with significant impacts: Upon submission of the Registration Form, EPA would within 25 days request the proponent to conduct a detailed Environmental Impact Assessment (EIA) study to understand fully the environmental impacts of the proposal and how they would be mitigated.

Per the requirements of the LI, 1652 Draft ESIA Reports submitted are advertised for 21 days for interested stakeholders to review the reports and submit their concerns to the EPA for consideration before a decision is taken on the proponent's application for an Environmental Permit

Section 17 (I) of the LI 1652 states "The Agency shall hold a public hearing in respect of an application where – (a) upon a notice issued under regulation 16 there appears to be great adverse public reaction to the commencement of the proposed undertaking; (b) the undertaking will involve the dislocation, relocation or resettlement of communities; or (c) the Agency considers that the undertaking could have extensive and far-reaching effects on the environment. For the purpose of conducting a public hearing, the Agency shall appoint a panel composed of not less than three persons and not more than five persons. 1. At least a third of the panel members shall be residents of the geographical area of the proposed undertaking and shall reflect representation of varying opinions, if any, about the hearing. 2. The chairman of the panel shall be appointed by the Agency from among the members but shall not be a resident of the locality of the proposed undertaking.

These provisions in the Environmental Assessment Regulations LI 1652 underscore the relevance and weight of stakeholder engagement in the entire Environmental and Social Assessment of Projects in Ghana

2.2 World Bank' Environment and Social Standard Ten (ESS 10) – Stakeholder Engagement and Information Disclosure

Stakeholder engagement and information disclosure is a key requirement of all World Bank funded projects. The introductory paragraph of ESS 10 states "This ESS recognises the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to a successful project design and implementation".

ESS 10 stipulates the development and implementation of a stakeholder engagement plan to engage with stakeholders throughout the project life cycle, and early in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The ESS 10 also requires borrowers to engage in meaningful consultations with all stakeholders. The project is required 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. In the case of the SOCO Project, the wide geographical location of the sub-projects, the number of project districts and the multiplicity of actors involved warrants the need to deepen stakeholder consultation throughout the project cycle.

3.0   STAKEHOLDER IDENTIFICATION AND ANALYSIS

This chapter describes stakeholders identified for the engagement and their various categorisations.

For the purpose of effective and tailored engagement of the proposed project(s) can be divided into the following core categories:

Affected Parties: persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

Other Interested Parties: – individuals/groups/entities that 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 affect the project and the process of its implementation in some way; and

Vulnerable groups: persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status[1][1] and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups on infectious diseases and medical treatments in particular, be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Table 1 below shows the various stakeholders identified, their interests, and the expected period of engagement (project phase).

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

Table 1: Stakeholders identified, their perceived interests, and engagement				
Stakeholder Group	**Organisation**	**Stakeholder Category**	**Stakeholder Interest**	**Stakeholder engagement and involvement in Project**
National Stakeholders	Ministry of Local Government, Decentralisation and Rural Development (MLGDRD)	Interested Party	The MLGDRD is the responsible government counterpart and coordinating agency for the preparation and implementation of the proposed project. The Ministry is in the helm of the process for the establishment of a PIU. It will have a critical role in the implementation of the SEP.	Will span the entire project implementation period.
	Ministry of Finance	Interested Party	The Ministry of Finance is the responsible government agency for contracting government's credit.	The MOF will be engaged throughout the project implementation phase
	Ministry of Gender, Children and Social Protection (MoGCSP)	Interested Party	The MoGCSP will advise the PIU on strengthening the project objectives with existing safety net programmes for poor/ extremely poor household	The MoGCSP will be engaged throughout the project implementation phase
	Ministry of Youth and Sports	Interested party	The MoYS will advise PIU on Youth centric policies and youth programmes	The MoYS will be engaged throughout the project implementation phase
	National Development Planning Commission (NDPC)	Interested Party	Poverty alleviation, promotion of livelihoods	The NDPC will be engaged throughout the project implementation phase

Table 1: Stakeholders identified, their perceived interests, and engagement				
Stakeholder Group	**Organisation**	**Stakeholder Category**	**Stakeholder Interest**	**Stakeholder engagement and involvement in Project**
	Ministry of the Interior and National Security Ministry	Interested Party	These Ministries will advise the PIU on security and safety policies and interventions	These Ministries will be engaged annually. The frequency of engagement may be varied if the exigencies of the times demand during implementation
	Parliament of the Republic of Ghana	Interested Party	Article 181 of Ghana's Constitution authorises Parliament to authorise the granting and receiving of loans. The loan request for the project will have to be approved by the Parliament of Ghana.	Parliament will be consulted at the project preparatory phase r.
	Cabinet	Interested Party	National development. Approval of loan	Minister of the MLGDRD will regularly update cabinet on progress of work
	Ministry of Foreign Affairs and Regional Integration (MoFARI)	Interested Party	The MoFARI will coordinate and manage the diplomatic relations particularly with the other implementing countries of the project.	To be engaged throughout the project implementation phase
	Ghana Immigration Service	Interested Party	Ensure cross-border management	To be engaged throughout the project implementation phase

Table 1: Stakeholders identified, their perceived interests, and engagement				
Stakeholder Group	**Organisation**	**Stakeholder Category**	**Stakeholder Interest**	**Stakeholder engagement and involvement in Project**
	Ghana Police Service	Interested Party	Enforce Law and order	To be engaged throughout the project implementation phase
	National Disaster Management Organisation	Interested Party	Coordinate and implement disaster response plans	To be engaged throughout the project implementation phase
Development Partners	The World Bank (WB)	Interested Party	The WB will provide financing (credit) to the government of Ghana (GoG) for the implementation of the proposed project. It will also offer technical backstopping support for the project's PIU.	To be engaged throughout the project implementation phase
	USAID, AfDB, UNICEF, GIZ, etc	Interested Party	These partners have played active roles in the development of the country but more specifically in the selected Project Regions	These stakeholders will be engaged annually to share project information including progress of implementation, challenges etc
Regulatory Authorities	Environmental Protection Agency	Interested Party	The Regional offices of the EPA will be responsible for the registration of subprojects and reviewing the ESIA	To be engaged throughout the project implementation phase
	Lands Commission	Interested Party	The Land Valuation Division (LVD) of the LC will be responsible for assessing compensation resulting	To be engaged throughout the project implementation phase, where relevant

Stakeholder Group	Organisation	Stakeholder Category	Stakeholder Interest	Stakeholder engagement and involvement in Project
			from the land acquisition or damage to an asset caused by the project.	
	Office of the Administrator of Stool Lands	Interested Party	Ensure requirement to consult with stool and traditional authorities on matters relating to the administration and development of stool land	To be engaged throughout the project implementation phase, where relevant
	National Youth Authority	Interested Party	Coordinate and facilitate youth engagement	Will be engaged throughout the project implementation phase
	National Council for Persons with Disability	Interested Party	Ensure the integration of strategies that allow the participation of persons with disabilities.	Will be engaged throughout the project implementation phase
Regional/District Stakeholders	Regional Co-ordinating Councils (RCCs)	Interested Party	The RCC will coordinate, monitor, and report on the activities of the MMDAs	Will be engaged throughout the project implementation phase
	Regional Offices of EPA	Interested Party	Review the ESIA and the ESMP	Will be engaged throughout the project implementation phase
	District Assemblies	Interested Party	Lead implementers of all subprojects	Will be engaged throughout the project implementation phase

Table 1: Stakeholders identified, their perceived interests, and engagement

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Stakeholder Group	**Organisation**	**Stakeholder Category**	**Stakeholder Interest**	**Stakeholder engagement and involvement in Project**
	Northern Development Authority	Interested Party	Will advise the PIU on the coordination of development of activities by ensuring private sector investment	Will be engaged throughout the project implementation phase
Communities	Traditional Authorities/ Opinion Leaders	Affected Party	Support the implementation of the subproject	Will be engaged throughout the project implementation phase
	Youth groups Women and women associations	Affected Party	Participate in the implementation of the subproject	Will be engaged throughout the project implementation phase
	Persons with Disabilities (PWDs)	Affected Party	Participate in the implementation of the subproject	Will be engaged throughout the project implementation phase
CSOs/NGOs	Civil Society Organisations	Interested Party	Promote awareness, transparency, and accountability	Will be engaged throughout the project implementation phase

Table 2. Tailored Stakeholder Engagement Measures (Disadvantaged/Vulnerable Individuals or Groups)

Stakeholder Group	Limitation to Engagement	Frequency	Measures/Resources to Facilitate Engagement
Female beneficiaries	May be uncomfortable in sharing opinions, asking questions, or raising concerns in the presence of males, due to cultural/social norms.	Will be engaged throughout the project implementation period (also through the GM)	• Hold female focus group discussions. • Promote outreach activities led by female facilitators. • Ensure the dissemination of key project messages through multiple channels, including local radio, word of mouth, banners, etc. This will include audio-visual materials for illiterate communities.
	Barriers to accessing these meetings (for example, lack of transportation, need of spousal permission, childcare needs)		Time for outreach activities to consider the most suitable hours for females to attend.
Youth beneficiaries	May not be fully comfortable in sharing opinions, asking questions, or raising concerns in public settings, due to cultural/social norms	Will be engaged throughout the project implementation period (also through the GM)	• Hold youth specific focus group discussions (including gender specific youth sessions). • Promote outreach activities led by youth facilitators.
People with disabilities and elderly	Challenges associated with lack of transportation, inaccessible consultation venues and	Will be engaged throughout the project implementation period (also through the GM)	• Deployment of outreach (mobile) teams to reach remote communities. • Use of phone to reach out to beneficiaries where required.

	inaccessible formats of information dissemination.		• Ensure the dissemination of key project messages through multiple channels, including radio, social media, word of mouth, banners, etc. This will include audio-visual materials for illiterate communities.
Migrants/ displaced persons	Migrants might feel unwelcome to attend group meetings for fear of discrimination.	All year round throughout the project implementation period (also through the Grievance Redress System.)	• Use of Religious leaders to facilitate participation in stakeholder engagement activities. • Ensure the dissemination of key project messages through multiple channels, including radio, social media, word of mouth, banners, etc

The long list of Stakeholders identified above were classified using the Power/Interest grid for stakeholder prioritisation. The position of each stakeholder on the grid became the basis for identifying the level of engagement with them. Specifically, the criteria in the box below were adopted.

- **High power, highly interested people (Manage Closely)**: you must fully engage these people and make the greatest efforts to satisfy them.
- **High power, less interested people (Keep Satisfied)**: put enough work in with these people to keep them satisfied, but not so much that they become bored with your message.
- **Low power, highly interested people (Keep Informed)**: adequately inform these people and talk to them to ensure that no major issues are arising. People in this category can often be very helpful with the detail of your project.
- **Low power, less interested people (Monitor)**: again, monitor these people, but don't bore them with excessive communication.

Figure 1 below indicates that the degree of stakeholder interest and ability to influence project outcomes vary from low to high. Based on the above, the stakeholders can be categorised into the following.

- Stakeholders that have the potential to influence the SOCO Project (Ghana).
- Stakeholders that have interest in the Project and the proposed interventions and will be directly and/or indirectly impacted by the project.
- Stakeholders that might have some interest but have little authority to influence the project outcomes

Stakeholders that have the potential to influence the SOCO Project (Ghana).

Primary stakeholders (e.g., District Assemblies, Regional Co-ordinating Councils, members of Parliament, Ministry of Finance, and the World Bank) that have both great interest in the Project and the power to influence its success. The PIU must manage these stakeholders closely to sustain their interests and ensure that they advocate for the project at all levels of decision-making. This can be done by providing regular updates, and publicising achievements made and their impacts, especially on communities.

Secondary stakeholders that have no particular interest in the SOCO Project but have the power to influence it because of their regulatory role. The Environmental Protection Agency and Lands Commission fall within this category. The PIU must satisfy the regulatory requirements of this sub-group.

Stakeholders that have interest in the Project and the proposed interventions and will be directly and/or indirectly impacted by the project.

Primary stakeholders under this category include chiefs and community leaders who may provide land for the sub-projects. They have vested interest in the project. Their critical involvement will ensure the success of the Project.

Secondary stakeholders under this include NGOs and Community-Based Organisations (CBOs), such as Billaw and Suke Town Development Associations (Lambussie-Karni District).

Others include the public and vulnerable groups. They can either garner support for the project or otherwise even though they may not directly have the authority to directly influence the project. The PIU must keep this sub-group informed.

Stakeholders that might have some interest but have minimal authority to influence the project outcomes

This category includes stakeholders that may have minimal interest in the overall project and minimal power to influence its outcome. Examples include multilateral and bilateral development partners such as Africa Development Bank (AfDB), United States Agency for International Development (USAID) and the Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ) that have several ongoing projects in the northern regions. The PIU must monitor this sub-group to track and synchronise project activities in the project communities.

1.

		Keep Satisfied EPA Lands Commission	**Manage Closely** MLGDRD Cabinet Parliamentarians Ministry of Finance Regional Coordinating Councils Municipal/District Assemblies
High Influence Low		**Monitor and Inform** GIZ USAID AfDB	**Keep Informed** Civil Society Orgaizations Traditional Authorities Local Chiefs Community Youth Leaders Ministry of Gender, Children and Social Protection Ministry of Food and Agriculture National Disaster Management Organanization National Youth Authority National Council for persons with Disability National Dev't Planning Commission Ghana Immigration Service Ghana Police Service Office of the Administrator of Stool Lands Project beneficiaries
		Interest	
		Low	High

Figure 1: Influence-Interest Stakeholder Grid

4.0   PROPOSED STAKEHOLDER ENGAGEMENT PROGRAM UNDER THE PROJECT

This chapter discusses actual stakeholder engagement programs to be executed under the GGLRSCP.

4.1   Principles underlying the stakeholder engagement

The PIU shall fully adopt the concept of meaningful consultations (two-way process) as spelt out in the World Bank's Environmental and Social Standard 10. The overall objective is to ensure that stakeholders are given adequate opportunity to express their opinions on all aspects of the project – benefits, risks, impacts, and mitigation measures for consideration by the PIU. Based on the above, the following shall guide the Stakeholder engagement process:

(a) Commence Stakeholder Engagement at Project design Phase. Extensive consultations have been held at various levels to gather initial views on the project proposal to inform project design.
(b) Encourage stakeholder feedback. Consultation is meaningful when information obtained helps in shaping project design to obtain desired outcome.
(c) Shall be continuous during the entire project design and implementation phases.
(d) Shall support active and inclusive engagement with the different segments of the communities, especially the project-affected parties.
(e) Shall be based on the dissemination of relevant, transparent, objective, and meaningful information in a timely manner, in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders.
(f) Shall consider and respond to feedback; and,
(g) Shall be free of external manipulation, interference, coercion, discrimination, and intimidation

4.2   Proposed Strategy for Stakeholder Engagement

It is envisaged that stakeholder engagement will be undertaken at all phases of the project: concept (preparation and design); appraisal (up to negotiation and board approval); implementation and mid-term evaluation and completion. At the evaluation phase, the objective for engaging stakeholders would be to document experiences and lessons learnt. The level of engagement with each identified stakeholder may vary, depending on the prevailing project cycle as well as the issues and concerns to be addressed.

Achieving the project's objectives requires the involvement and effective participation of all stakeholders. This required consultation and stakeholder participation using an inclusive approach. This approach will be applied throughout the project cycle, with the aim of building around stakeholders, effective buy-in and commitment.

Consultations will be carried out in different ways, adapted to targeted groups. To conduct the interviews, sub-groups will be formed by category of actors, especially at the level of local communities by age group, in order to reduce the influence of elderly people with too much decision-making power. Also, surveys by questionnaires will be organised to collect and integrate into the implementation of the Project, the opinions of people potentially benefited and affected by the project. In addition, institutional and public consultations at the community level will be organised for the various stakeholders. During these public

consultations, the project will pay special attention to youth, women and girls by giving them specific time and space to voice their opinions.

Thus, we can note:

- identification and analysis of stakeholders;
- planning of the strategy for stakeholder consultation and participation;
- information dissemination strategy;
- communication strategy;
- consultation and involvement of stakeholders;
- complaint management;
- feedback

Consultations: Consultation shall be a process, not an event and involve the following:

- Interviews with stakeholders and relevant organisation
- Surveys, polls, and questionnaire administration
- Public/community meetings and forums
- Workshops
- Focus groups discussions on specific issues
- One-on-One meetings
- Other traditional mechanisms for consultation and decision-making.

Information Disclosure: The SEP will encourage, promote, and ensure total disclosure of information at all levels. The channels for disclosure will include the consultation channels plus the following:

- Newspapers, posters, radio, television.
- Information centres and exhibitions or other visual displays;
- Brochures, leaflets, posters, nontechnical summary documents and reports;
- Official correspondence, meetings.
- Website,
- Social media,
- Notices to specific audience as the case may be
- Project specific signboards

Feedback mechanisms:

- Disclosure of avenues for feedback
- Timelines for collecting feedback
- Defining responsibilities for giving and taking feedback
- Design, set up and operationalization of Grievance Mechanism (GM)

Review of SEP: This strategy will involve sharing of comments, negotiating on the relevant comments, and providing timelines for incorporation.

In all communication strategies described in this SEP, issues related to the impact of project activities on girls and women will be addressed using an appropriate methodology that respects the dignity of those consulted. Consultations regarding sexual exploitation and abuse or sexual harassment (SEA/HS) will be done only by specialists with the required expertise.

Community-based volunteer workers and direct and indirect project workers, both male and female, will also be informed of the contents of the code of conduct, the standards to be met and the sanctions established for misconduct. All workers mentioned will also be informed of the services available to SEA/SH survivors in their communities. These consultations should never attempt to identify survivors of violence but should aim to identify general trends and challenges. If a person, during or after the consultation meeting, discloses abuse, the facilitator should refer them to the nearest SAE/HS service provider.

4.3 Summary of Previous Stakeholder Engagement Activities

Several key stakeholders were engaged during project preparation to obtain relevant information to aid project design. The consultations were carried out from June 2021 to October 2021 using various techniques and platforms, such as individual and group interviews, focus group discussion or townhall meetings. For this purpose, adapted data collection tools were designed (individual and focus group interview guides; questionnaires). Questionnaires were sent to certain organisations (as needed), given the difficulty of bringing them all together due to the COVID 19 pandemic. Public meetings were also organized to provide for the active participation of local populations (women, young people), community leaders, traders, potentially affected persons. Care was taken to take account the needs and interests of women and other vulnerable groups and promote their active participation (e.g., through smaller focus groups discussions).

Precautionary approaches were employed during these consultations to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting channels of communication, in light of the current COVID-19 situation. These measures will continue to be taken:

- Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings;
- If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups 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, identify channels for direct communication with each affected household via a context

specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;

- Identify trusted local civil society, ethnic organizations, community organizations and similar actors who can act as intermediaries for information dissemination and stakeholder engagement; engage with them on an ongoing basis.

Table 3 below, provides a summary of stakeholders engaged and general issues discussed, at the current stage of the engagement process:

Table 3. Summary table of stakeholders previously engaged						
Stakeholder Group	Institutions	Date of Consultation	Mode of engagement	Venue	Type of information disclosed	Interests or Issues Raised
Multi-sectoral technical working group (under the SOCO Project)	World Bank Group, MLGDRD, Ministry of Finance, Ministry of Gender, Children and Social Protection, Ministry of Youth and Sports, Ministry of Food and Agriculture, National Development Planning Commission, Ghana Immigration Service, National Disaster Management Organisation and the Northern Development Authority etc.	Project preparation mission from 1-8 June 2021 Weekly meetings from June 23 to October 2021 Pre-appraisal preparation mission from 1-10 November 2021	Online meetings	Online	Project PDO, rationale, target locations, project design and implementation arrangements	Design of project and implementation arrangements
Ministry of Finance	Ministry of Finance	27 May 2021, 3 August 2021 etc.	Online meeting	Online	Project PDO, rationale, target locations,	Financing, preparation, and implementation of project
Regional Co-ordinating Councils (RCCs)	Upper West Regional Coordination Council	22-09-2021	In-person meeting	Office of the UW Regional Coordinating Director	Project's PDO	The RCCs monitor the activities (including physical projects) being

Table 3. Summary table of stakeholders previously engaged						
Stakeholder Group	Institutions	Date of Consultation	Mode of engagement	Venue	Type of information disclosed	Interests or Issues Raised
	Savannah Regional Coordination Council	20-09-2021	In-person meeting	Office of the Savannah Regional Coordinating Director	Targeted Gulf of Guinea Countries Rationale for the regional approach	undertaken by the District Assemblies Monitoring of sub-projects under the project to be factored into quarterly monitoring undertaking by the RCCs
	North-East Regional Coordination Council	24-09-2021	In-person meeting	Office of the NE Regional Coordinating Director	Project locations (regions) in Ghana	
Municipal/District Assemblies	Nadowli-Kaleo District Assembly	22-09-2021	In-person meeting	Conference Room	Project Districts within the specific region selected	**Districts**
	Lambussie-Karni District Assembly	22-09-2021	In-person meeting	Conference Room	Basis for the selection of project districts	Willingness to implement project activities Regular flow of funds required for successful implementation Need to enhance capacity of the Assembles in terms of resources and training in safeguards
	East Gonja District Assembly	16-09-2021	In-person meeting	Office of the Municipal Coordinating Director		
	North East Gonja District Assembly	17-09-2021	In-person meeting	Conference Room	Project components	

Table 3. Summary table of stakeholders previously engaged						
Stakeholder Group	Institutions	Date of Consultation	Mode of engagement	Venue	Type of information disclosed	Interests or Issues Raised
	Sawla-Tuna-Kalba District Assembly	20-09-2021	In-person meeting	Conference Room	Sub-project types to be implemented	
	West Mamprusi District Assembly	24-09-2021	In-person meeting	Conference Room		
	Bawku District Assembly	16 – 09-21	In-person meeting	Conference Room		
	Builsa North District Assembly	17 – 09- 2021	In-person meeting	Conference Room		
	Karaga District Assembly	16 – 09 - 2021	In-person meeting	Conference Room		
	Kpandai District Assembly	17- 09 - 2021	In-person meeting	Office of the Coordinating Director		
	Nanton District Assembly	16 – 09 -2021	In-person meeting	Office of the Coordinating Director		
Communities	*Nadowli-Kaleo* Kaleo Loho	21-09-2021	Town hall meeting	Area Council office	Targeted Gulf of Guinea Countries Rationale for the regional approach	High interest in development projects
		21-09-2021	Public Fora	Community meeting ground		

Table 3. Summary table of stakeholders previously engaged						
Stakeholder Group	Institutions	Date of Consultation	Mode of engagement	Venue	Type of information disclosed	Interests or Issues Raised
	Lambussie-Karni Billaw Suke	22-09-2021 21-09-2021	Public Fora	Community meeting ground	Project locations (regions) in Ghana Basis for the selection of project districts Sub-project types likely to be implemented	Willingness to donate land for any communal developmental project Assurance of completion of development project once commenced required.
	East Gonja Sisipe Kalende Grunshie-Zongo	16-09-2021 16-09-2021 16-09-2021	Public Fora Public Fora Public Fora	Community meeting ground Community meeting ground Community meeting ground		
	North- East Gonja Fuu Kpalbusi *Sawla-Tuna-kalba* Nakwabi Soma	17-09-21 17-09-21 20-09-2021 20-09-2021	Focus group discussion Focus group discussion Focus group discussions	Chief's palace Chief's palace Community meeting ground		
	West Mamprusi Guabluga	24-09-2021	Focus group discussions	Chief's Palace		

Table 3. Summary table of stakeholders previously engaged						
Stakeholder Group	Institutions	Date of Consultation	Mode of engagement	Venue	Type of information disclosed	Interests or Issues Raised
	Tinguli	24-09-2021	Focus group discussions	Community meeting grounds		
	Bawku Municipal Kpalwega	16 – 09 - 2021	Focus group discussions	Community meeting grounds		
	Builsa North Kalijiisa	17 – 09 - 2021	Focus group discussions	Community meeting grounds		
	Kpandai District Nkanchina	17 -09 - 2021	Focus group discussions	Community meeting grounds		
	Nanton District Zing Boglini	15-09-2021	Focus group discussions	Community meeting grounds		
	Kpandai District Nkanchina	17-09-2021	Focus group discussions	Chief's palace		
	Nkwanta North Damanko	20-09-2021	Public Fora	Community meeting place		

Table 3. Summary table of stakeholders previously engaged						
Stakeholder Group	Institutions	Date of Consultation	Mode of engagement	Venue	Type of information disclosed	Interests or Issues Raised
	<u>Jasikan District</u> Bodada	22-09-2021	Focus Group Discussions	Chief's palace		
Environmental Protection Agency (EPA)	Upper West Regional Office Northern Regional Office Oti Regional Office Upper East Regional Office		In-person meetings	Regional Directors' offices	Project's PDO Targeted Gulf of Guinea Countries Rationale for the regional approach Project locations (regions) in Ghana Project Districts within the specific region selected Basis for the selection of project districts Project components Sub-project types to be implemented	Involvement of the Regional Directors in project stakeholder activities to ensure a better understanding of the project activities Registration of sub-projects with the EPA prior to sub-project commencement Timely payment of processing and permit fees to ensure permit acquisition before actual commencement of construction activities Effective stakeholder engagement

4.4   Proposed Strategy to incorporate the views of stakeholders

This section discusses the strategies that will be adopted to engage different categories of stakeholders depending on their position in the interest-influence matrix (figure 1), and the objective of the engagement.

4.4.1   Engaging Project Partners

Project partners such as the MOF, MGCSP, MoYS, MoI, Parliament, etc will be directly involved in its implementation. At the design stage, the MLGDRD will be directly involved in the implementation of the project and will report directly to the WB. After the coming on-board of the PIU, the MLGDRD will serve as the reporting conduit for the WB. Thus, all engagements with these project partners are considered part of the consultation process.

4.4.2   Engaging Regulators

The PIU will hold one-on-one (in-person) meetings with relevant government/regulatory officials (mainly the regional offices of the Environmental Protection Agency and the Lands Commission) to discuss compliance to environmental permit conditions and other related issues. At the design stage, the EPA offices were engaged to discuss procedures for project registration and permitting. When required, the PIU will engage the EPA to organise tailor-made orientation programs for key actors (e.g., Project Contractors) in their respective regions on safeguards. Additionally, the EPA and the Land Commission's regional offices will be invited to partake in all projects related workshops and programs in their respective regions. This will be done to foster collaboration; ensure they have a good understanding of project objectives to aid in their monitoring and reporting.

4.4.3   Engaging Implementing Partners – RCC, DAs

It is envisaged that actual project implementation will be done by the District Assemblies (DA) with technical backstopping from the PIU. For a successful project implementation there will be continuous communication (almost daily) between the different consultants at the PIU and their subject matter counterparts at the DA level. In addition, there will be workshops organised annually to discuss project implementation status, challenges, and the way forward. The RCCs will be invited to partake in the annual review workshops

4.4.4   Engaging Project communities

Project communities are the ultimate beneficiaries of the sub-projects to be implemented. Regular interaction between the project implementers and the community leaders/members will be required to ensure that the desired project outcomes are met. At the community level, a liaison officer shall be appointed by the project to liaise between the community and the District Assembly. In addition, the project grievance redress system (especially the contact numbers) will be highly publicised to ensure that community members always have access to duty bearers. In addition, there will be annual accountability fora organised in project communities during which all relevant actors will be present to discuss project outcomes. This accountability fora will be facilitated by a local NGO if available.

Engaging the Public, which include the use of:

- Newspapers, posters, radio, television.
- Information centres and exhibitions or other visual displays.
- Brochures, leaflets, posters, nontechnical summary documents and reports.
- Official correspondence, meetings.
- Website,
- Social media.

All the feedback collected from the various stakeholders will be summarised and incorporated as part of the project design, implementation, and monitoring (including the Project implementation manual), as well as to inform course correction of the project throughout project implementation.

4.5 Proposed Strategy for Taking into Account the Views of Vulnerable Groups

For the inclusion of vulnerable groups in the project implementation process, the services of non-governmental organisations (NGOs) that are very active in defending the interests of these groups and disadvantaged people and that operate in the districts/ communities targeted by the project. These NGOs will help identify vulnerable groups and organise information and awareness sessions on aspects of the project deemed relevant.

In addition, the information that will be obtained from the consultations with the beneficiary populations and especially the project affected persons (PAPs) will help in identifying the vulnerable groups. The solutions to the identified problems will be communicated through the same channel. The actions of the project will be implemented taking into account the expectations and concerns expressed by the beneficiary populations.

4.6 Stakeholder Communication Strategy

To enhance project outcomes, effective communication with stakeholders is considered a sine-qua none. The PIU will adopt a three-pronged communication approach:

- Deliver relevant tailor-made project information to the different stakeholder groups in an appropriate, gender sensitive, and timely manner, and foster a regular two-way flow of information between project implementers and these stakeholders.
- When available, engage trusted third-party local NGOs in the communities or project area to undertake regular engagements, build trust and galvanize community support for the project.
- Adopt an open-door policy to community leaders, youth group leaders and other stakeholders to engender community involvement and ownership from the onset of the project.

The communication strategy of the project is based on the following principles:

- Simple: the project aims to keep clear, consistent, and comprehensible messages to its different audiences.
- Cooperative: to make best use of the available resources, the PIU will involve the different partners as well as beneficiaries in the communication strategy as much as possible.
- Interactive: the PIU will listen to and incorporate feedback from its stakeholders to increase interest in its activities and achievements and fine-tune its messages.
- Accountable: the communication strategy will be monitored and evaluated according to the project activities plan and specifically the relation between communication goal, target group/beneficiary, message, and communication timing. Furthermore, the focus of the communication strategy will change depending on the stage in the project implementation, reflecting the priorities relevant to that stage.

4.7 Communication and Information Disclosure Tools

A wide range of communication tools will be used to disseminate information to the different stakeholders whose appreciation and level of understanding of the project might be different.

4.7.1   Printed Communications

a. Project manual:

As with all Bank funded projects of this nature, a project implementation manual (PIM) will be developed to guide the implementation of the project. This document will contain the eligibility and selection criteria for community and sub-project selection, processes, etc. The PIM will be available on the MLGDRD's website for interested stakeholders for their information, and if they wish to raise feedback. It is envisaged, that National level stakeholders and international and national CSOs might access the PIM.

b. Project reports

Reports such as quarterly, half-yearly and annual reports prepared by the PIU are valuable tools to both project teams/staff and stakeholders. It provides several benefits. It is expected to keep stakeholders such as the MLGDRD, WB, MOF etc informed about milestones, issues, resolutions, costs, risks, and next steps. These reports will cover all areas of the project implementation— Procurement, safeguards, monitoring and evaluation, financial management etc. Through these reports, internal and external stakeholders will be able to track the current progress of the project and compare it against the original plan. They can identify risks early and take corrective action. It is envisaged that these reports will bring visibility to expenses and the budget.

4.7.2   Electronic Communication, Online and Social Media Platforms

Online communication will be a critical channel for communicating with wide audiences because it offers the opportunity to reach the widest audience.

*a. **Website***: The MLGDRD website (http://www.mlgrd.gov.gh/) will be used to communicate to stakeholders. The Ministry's website will host a project related website link that will provide information on the project objectives, components, and activities. It will also host disclosed project documents such as the SEP, PAD, ESMF, and PIM.

The websites will provide programme information, pictures, definitions, and translations of technical data. Information on the website will be frequently updated to ensure that stakeholders are abreast with the status of the project always.

*b. **Social media platforms***: social media has become an acceptable form of reaching out to the masses, especially the youth. Platforms such as Facebook, YouTube, LinkedIn and Twitter, Instagram among others; shall be leveraged upon to enhance project visibility. Brochures and other project news bulletins will be widely distributed on these social media platforms.

*c. **Email updates***: The project will use email updates for distributing important messages/or announcements to identified stakeholders.

4.7.3   Events

The PIU will organise events, including community durbars/public meetings and workshops on an as-needed basis aimed at seeking inputs from a broad variety of stakeholders. When organised, all appropriate COVID-19 protocols will be observed. These will include observing a sitting distance of not less than 6 feet, provision and use of nose masks, provision of handwashing facilities and sanitizers among others.

4.7.4 Traditional Media

The PIU will rely on all the available array of traditional media channels that have broad reach including documentaries, news, press releases, commentaries, media interviews or background briefings (television, radio, newspapers, magazines etc.) to share project information with stakeholders. Community billboards, and posters, will be used where appropriate.

4.7.5 Other methods used to engage stakeholders

Other methods of engagements such as Focus Group Discussions, one-on-one engagements, surveys, use of Community Information Centres, leaflets and flyers will also be used.

4.7.6 Project Implementation phases

For the successful implementation of the Project, stakeholders will be informed and involved in the process. Thus, to achieve this, a participation, reporting and accountability strategy will be implemented. The

Table 4 below shows the planned engagement methods and frequency of engagement for the various stakeholders and disclosure strategies, at the different project preparation and implementation phases.

Table 4. Stakeholder Engagement Strategy							
Project Stage	Target Stakeholders	Engagement Objectives	Proposed Method	Proposed message/Issues of consultation	List of documents/ information to be disclosed	Responsible Agency	Frequency of engagement
Preparation and Appraisal	Ministry of Finance The World Bank Ministry of Local Government, Decentralization and Rural Development	Ensure there is adequate funding for project design and implementation phase Ensure all stakeholders have been engaged and clearly understands the Project goals · Ensure that the MLGDRD has met all relevant WB requirements for approval. Ensure that implementing partners have similar understanding of project objectives	Work group meetings Partners meeting Work planning meetings	Funding for project implementation Project concepts, benefits, and impacts Exclusion criteria – menu of sub-projects Project implementation schedule and timelines.	Project concept note SEP PAD Financing Agreement ESMF, RPF, ESCP	MLGDRD	Monthly (Could vary depending on level of preparation achieved)

Table 4. Stakeholder Engagement Strategy							
Project Stage	Target Stakeholders	Engagement Objectives	Proposed Method	Proposed message/Issues of consultation	List of documents/ information to be disclosed	Responsible Agency	Frequency of engagement
	The Parliament of Ghana	Get 'buy-in' for the passage of the development finance bill[2]	Meeting with Parliament Select committee	Communicate importance of closing the development gap (north -side divide		MLGDRD	Once (during the Project preparatory phase)
	Cabinet	Approval for the project	Cabinet Memo Meeting with Cabinet	importance of closing the development gap (north -side divide Communicate need for job creation Communicate		MLGDRD (Minister)	Once (during the Project Preparatory Phase)
	Regional Offices of the EPA	Seek clarification on project permitting requirements Obtain EPA's views on likely impacts of proposed project	In-person meeting	Project objectives Project locations (district-wise)	SEP ESMF RPF ESCP	MLGDRD (Project Preparatory Team)	Twice – during ESMF preparation and afterwards for review

[2] This is part of the annual budgeting cycle where Parliament needs to be engaged to approve credit for Project implementation.

Table 4. Stakeholder Engagement Strategy							
Project Stage	Target Stakeholders	Engagement Objectives	Proposed Method	Proposed message/Issues of consultation	List of documents/ information to be disclosed	Responsible Agency	Frequency of engagement
	Lands Commission	Seek clarification on proper land acquisition processes in the project areas	In-person meetings	Project objectives Project locations (district-wise) Sub-project menus	RPF ESMF	MLGRD (Project Preparatory team)	Once at the Project preparatory phase
	Regional Co-ordinating Councils	Inform the RCCs of the progress of ongoing project. Prepare the RCC for monitoring of projects upon commencement	In-person meeting	Project Objectives Regional distribution Expected duration and funding source Rational for the choice of regions and districts.			Continuous (There may be continuous engagements until all project documentations ate well formulated)
	District Assemblies	Inform the DA of the project Assess the capacity gaps at the DA.	In-person meetings				
	Project Communities	Assess the community development needs in the project area Assess existing local	In person meeting	Project Objectives Project locations Potential sub-projects. Need for community involvement.			Continuous (There may be continuous engagements until all project documentations

Table 4. Stakeholder Engagement Strategy							
Project Stage	Target Stakeholders	Engagement Objectives	Proposed Method	Proposed message/Issues of consultation	List of documents/ information to be disclosed	Responsible Agency	Frequency of engagement
		management structures Consult broadly on draft E&S instruments		Access to land for communal projects Land ownership			ate well formulated)
Implementation Phase	Ministry of Finance Ministry of Local Government, Decentralization and Rural Development	Ensure that SEP and other project Plans/ ESF instruments (e.g., ESMF, LMP) are being implemented as designed. These stakeholders will monitor the SEP implementation status of the SOCO Project. These stakeholders will ensure compliance to the project's E&S requirements	Partners meetings Technical meetings Project briefs. WB Implementation support missions (ISM) Mid-year reviews	The implementation status: project delivery, finance (expenditure), safeguards etc.	Status Reports Quarter reports Annual Reports E&S Instruments including ESIAs, ESMPs, A/RAPs, Labour Management Plans, Occupational Health and Safety Plan Emergency preparedness and response Project monitoring and	PIU	Quarterly

Table 4. Stakeholder Engagement Strategy							
Project Stage	Target Stakeholders	Engagement Objectives	Proposed Method	Proposed message/Issues of consultation	List of documents/ information to be disclosed	Responsible Agency	Frequency of engagement
					safeguard compliance report GMs		
	The Parliament and The Cabinet of Ghana	As part of the annual budgeting cycle where Parliament needs to be engaged to approve credit for Project implementation. Keep policy makers informed	Project briefs and presentations ·Meeting with Parliament Select committee · Meeting with Cabinet		Policy briefs ·Fact sheets Evidence-based video documentaries		Annually
	EPA	Discuss outcomes of EPA monitoring of sub-projects being implemented. Ensure the effective and prudent enforcement of regulations.	Workshops meetings	Project compliance to safeguards requirements.	EPA monitoring report Project's safeguards monitoring reports	PIU	Annually

Table 4. Stakeholder Engagement Strategy							
Project Stage	Target Stakeholders	Engagement Objectives	Proposed Method	Proposed message/Issues of consultation	List of documents/ information to be disclosed	Responsible Agency	Frequency of engagement
	Lands Commission	Discuss land acquisition related issues (especially when RAPs are required to be implemented	Meetings Workshops	Possible Resettlement Issues	RPF ESMF ARAP/RAP (Possibly)	PIU	Annually (but also as and when required)
	The 6 Regional Co-ordinating Councils and 63 District Assemblies	Obtain implementation updates Evaluate challenges and prospects Review performance indicators	Review meetings Workshops	Performance Review	Specific project reports Quarterly reports Annual reports	MLGDRD/PIU	Twice yearly
	<u>Communities</u> Traditional Authorities Opinion Leaders Youth Leaders General community	Obtain feedback from beneficiary communities Inform communities about progress of work Consult broadly on draft site-	Open fora Town hall meetings	Communities' impression Feedback on "as built" facilities Changes required	SEP, MOUs, ESIAs, ESMPs, LMP etc	MMDAs, PIU	Half yearly (every 6 months)

Table 4. Stakeholder Engagement Strategy							
Project Stage	Target Stakeholders	Engagement Objectives	Proposed Method	Proposed message/Issues of consultation	List of documents/ information to be disclosed	Responsible Agency	Frequency of engagement
		specific E&S instruments					
	Civil Society organizations Development partners. NDPC NADMO National Youth Authority National Council for Persons with Disability Ministry of Gender, Children and Social Protection Ministry of Youth and Sports Ministry of Interior Ministry of Roads (Feeder Roads Department)	Update on project achievements. For development partners, seek synergies with planned programs For CSOs, provide information for dissemination	Workshops Meetings	Implementation updates Challenges Input into the way forward Experience sharing (Especially for Development Partners)	Brochures Annual Reports	PIU	Annually

Table 4. Stakeholder Engagement Strategy							
Project Stage	Target Stakeholders	Engagement Objectives	Proposed Method	Proposed message/Issues of consultation	List of documents/ information to be disclosed	Responsible Agency	Frequency of engagement
	Ghana Immigration Service Ghana Police Service						
Monitoring and Evaluation	GM Committees PAPs NGOs (working with youth, women) etc.	Preparation of follow-up reports on the completion of public consultations with stakeholders during the implementation phase Preparation of evaluation reports	Field visit Beneficiary surveys	Feedback and monitoring of project implementation impact to inform course correction or improvements	SEP Brochures Annual Reports	MLGDRD	Throughout the project cycle, field visits once every six months Survey at least annually Evaluation report mid-term and at the planned closure of the project

4.6 Planned activities particularly for management of environmental and social risks

Following the consultation activities carried out, the implementation of some of them will be pursued in the framework of the development and implementation of specific safeguard instruments. These activities are:

- the development, review, validation, publication, and implementation of environmental and social safeguard instruments, including the ESCP, SEP, ESMF (with PMP), EMSPs, RPF/ RAPs, LMP;

- preparation, implementation and monitoring of the SEA/SH Action Plan (as needed) in accordance with the SEA/SH risk level determined by the assessment at the project preparation phase;

- Preparation of the GM sensitive to SEA/SH complaints, codes of conduct and Occupational Health and Safety measures prior to the start of project activities and the contingency plan for the management of COVID-19 during the project implementation phase.

To be more precise, the activities envisaged are:

1) *Information and awareness on the Project and its potential risks and impacts*

The Social safeguards specialist of the project will take an active part in the information and sensitization activities of the populations in the areas covered by the project. They will be supported in this mission by consultants and other specialist (e.g., communications specialist, environmental specialist). Civil society organizations, NGOs and associations working in the sectors targeted by the project at the local, regional, and national levels will be strongly involved to inform, sensitise and train stakeholders on the management of these risks and impacts. This specialist will also be involved, in collaboration with the Environmental Safeguard Specialist, in the initiation, execution and monitoring of capacity building activities for project stakeholders on environmental and social risk management.

A communication and awareness-raising approach that is local, participatory, inclusive, and adapted to the socio-cultural context and that of COVID 19 will be adopted. It will include meetings with key representatives of the various stakeholders. Resource persons in each implementing commune will also be involved to inform and sensitize the local populations in their respective localities.

The communication strategy prepared will also promote awareness on the involvement of security personnel in the Project.

2) *Stakeholder consultation and participation*

Meetings, group discussions, individual interviews, and information and awareness workshops will be held regularly. They will result in the collection of opinions and concerns of stakeholders, mainly those potentially affected, on the management of potential environmental and social risks and impacts of the Project activities.

Special attention will be given to the needs and interests of women, youth, and other vulnerable groups (like people with disabilities). Material, technical, and special conditions favourable to their free expression will be observed. Interactions with women and girls will protect their physical and moral integrity by applying the rules of anonymity and

confidentiality (as needed). Consultations with women and girls will take place in separate and distinct groups from those of men under the facilitation of women agents in a safe place. These activities will be carried out under the responsibility of the Social Safeguards Specialist and Environmental Specialist supported by staff of the deconcentrated/decentralised administrative and technical services, actors of the communal technical services, NGOs/local associations, and persons specifically competent in the management of SEA/SH issues.

These stakeholder consultations and participations, which will take place at various stages of the Project's life, will have specific goals at each stage. They will include:

- Consultation during the preparation of environmental and social risk management instruments in order to inform stakeholders about the positive effects but especially the environmental and social risks, mitigation measures, gather their knowledge about these risks, take into account their priorities, concerns and interests, and engage them in an ongoing manner in the implementation of the project;
- The implementation of consultations aims to accompany the implementation of social risk management measures, particularly participatory monitoring during resettlement operations, grievance management, inclusion and consideration of vulnerable groups, and prevention and management of SEA/SH;
- implementation of the Regional Coordination and Dialogue Platform (component 3), particularly in strengthening regional dialogue, the capacities of national actors in knowledge management, and in citizen participation and monitoring of indicators related to social cohesion, climate change, border connectivity and FCV country risks
- involve them in the final evaluation of the implementation of the safeguard/ ESF instruments.

4.7   Consideration of Health Issues Related To COVID-19

The implementation of the Stakeholder Mobilization activities will take into account the global health context marked by the COVID-19 pandemic. Therefore, a COVID 19 plan will be developed.

COVID-19 Plan

If the current COVID-19 pandemic order is maintained, health prevention and social distancing measures must be adopted by the project to prioritize the health of the populations that will be impacted by the project and of the PIU staff or contractors who will be involved in consultations. The project will ensure that appropriate arrangements are made to meet all necessary requirements for welfare and hygiene and for the prevention of epidemic.

The following provisional protocol, which will need to be updated and improved according to the evolution and impact of COVID-19 in Ghana, should be adopted when certain conditions do not allow for face-to-face consultations or activities that require the mobilization and participation of a large number of people.

The communities that will potentially benefit from the project are already vulnerable. Among other things, they are heavily dependent on the informal economy, occupy areas prone to climate risks, and have limited or no access to communication technologies. Stakeholder engagement activities should not put them in an even more fragile position. The situation is even more difficult for women, as recent studies have shown.

Thus, a qualified person in the PIU, such as the Environmental Specialist, should be designated as the point of contact for dealing with COVID-19 issues. The specialist may be responsible for coordinating site preparation and ensuring that measures taken are communicated to workers, those entering the site and the local community. This person will also support the PIU in designing protective measures during community consultations and with the contractors' occupational health and safety (OHS) specialist for their staff.

The PIU must also ensure that its staff implement all government health measures in participation and stakeholder engagement activities. If these measures involve total or partial containment of the population, stakeholder engagement activities that involve physical contact should be paused. Nevertheless, in an ever-changing environment at the time of writing this plan, some communication activities such as the preparation of radio messages or communication materials could begin to be planned if access to technology and teleworking are possible.

If the situation allows for travel under certain conditions, activities that bring together large numbers of people such as public meetings, workshops and face-to-face training should always be avoided. Nevertheless, door-to-door surveys or small focus groups could be evaluated if distancing and hygiene measures are respected and those involved are adequately protected with recommended sanitary materials and distancing measures are adopted. The project should ensure that these materials are available and that its staff or providers are trained in this regard. In some cases, such as interviews with key stakeholders, online surveys may be possible.

In the context of the populations that will benefit or be impacted by the project, online meetings may not be feasible. This option could be considered for government officials who have an adequate internet connection. Even then, it would be necessary to ensure that a significant number of the target population can participate in an appropriate and safe environment.

Overall, the assessment of identified vulnerable groups should be updated. It should take into account how the crisis may impact, for example, the situation of women, as caregivers, or people with disabilities, probably with even more limited access to information, and incorporate these considerations into communication and stakeholder engagement strategies.

The project's communication activities could also support the districts or town halls in disseminating health information and, if possible, explain the consequences that these measures have on the implementation of the project.

Contractors shall take all necessary precautions to safeguard the health and safety of their personnel and shall take precautionary measures for their personnel's interactions with the surrounding communities during infrastructure construction and rehabilitation activities. These measures include, but are not limited to:

- The appointment of a Site Health and Safety Officer, who will have the authority to issue directives to maintain the health and safety of all personnel authorized to work on the site and to take protective measures to prevent accidents;
- Watching over the contractor's staff to adopt appropriate distancing and sanitary measures in their interactions with the surrounding communities;

- ensure, in collaboration with the local health authorities, that medical personnel, first aid facilities, ambulance services and any other specified medical services are available at all times on site; and
- ensure that appropriate arrangements are made to meet all necessary welfare and hygiene requirements and for the prevention of epidemics.
- These measures, and others as deemed appropriate, will be incorporated into the tenders and contracts of contractors.

If the incidence of COVID-19 in Ghana increases, the timetable for stakeholder engaged activities will be adapted to the context. The stakeholder engagement strategy will be in line with the provisions on prevention of the pandemic applicable to Ghana. The approach to be followed will be in line with the Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations.

5.0   GRIEVANCE MECHANISM

The Gulf of Guinea Northern Regions Social Cohesion project (SOCO) is pulling variety of actors from the local level through to the international level and targeting areas with very high incidence of poverty, conflicts of different levels, and communities sharing international boundaries. The project delivery processes could lead to conflicting interests and/or disagreements, which may potentially adversely affect the project development objectives and ultimately the target beneficiaries. To prevent, avoid and mitigate this, the project will implement a robust grievance redress mechanism.

The main objective of a Grievance Mechanism (GM) is to assist an entity to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective, and lasting outcomes. It also builds trust and cooperation as an integral component of broader community/citizen engagement that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Provide access to judicial or administrative remedies;
- Allows for anonymous complaints; and
- Provide a register for recording and tracking complaints and actions taken.

The involvement of multiple stakeholders and implementing agencies under the proposed project could lead to complaints, misunderstandings, conflicts, and disputes. The project will provide a GM that will provide all direct and indirect beneficiaries, service providers and other stakeholders the opportunity to raise their concerns and/or ask for information. Stakeholders will be informed of the GM in place, as well as the measures put in place to protect them against any reprisal for its use. This will be done during sensitisation activities and other interactions with stakeholders.

5.1   Rationale

A GM is a set of arrangements that allow local communities, employees, and other impacted stakeholders to file grievances with a project's implementer and seek redress when they see a negative impact as a result of the project's operations. It is a critical component of mitigating, managing, and resolving potential or actual negative consequences, as well as meeting international human rights duties and contributing to constructive relationships with the greater stakeholder community, particularly local communities, and employees.

Complaints, misunderstandings, disagreements, and disputes may arise because of land access, acquisition, and project operations that may affect other individuals, groups, or community holdings. As a result, a grievance procedure would be required to give a platform for all disgruntled parties to air their grievances.

PAPs will be able to file complaints about census inclusion, eligibility, and the temporary or permanent loss of their property, assets, or sources of income, as well as their compensation,

through a project-specific grievance resolution process that will be established/strengthened. During the formation and implementation of the grievance process, the project will guarantee that it is gender sensitive. It will ensure that women are represented on the GM committee, and that the GM responds to grievances from both men and women, as well as vulnerable groups, in an equitable manner. It is crucial to stress, however, that the Project's grievance redress method does not supplant existing legal processes.

The procedures, which will be based on consensus, will strive to resolve difficulties swiftly to expedite the receipt of entitlements without resorting to costly and time-consuming legal action. As part of the project's beneficiary community awareness operations, information about the GM and the procedures in place to protect PAPs from any retaliation for using it would be made available. Community gatherings with diverse organizations, local radio talks, public education campaigns, and community monitoring visits will all be important activities.

5.2   Potential grievances/disputes

Grievance processes are essential to ensure that PAPs can raise complaints or concerns without charge and with the assurance that the matter will be resolved quickly and satisfactorily. Grievances will be actively addressed and tracked to ensure that they are resolved, and appropriate actions are taken. A clear timetable for resolving grievances will be established, ensuring that they are addressed in a timely and appropriate manner, with corrective steps taken, and the complainant notified of the outcome.

Grievances and disputes that may develop during the implementation of the planned Project's operations may be related to the following topics.:
- Targeting
- Valuation of assets and compensation
- Disagreement on plot boundaries, either between the affected person and the expropriation agency or between two neighbours
- Disputed ownership of a given asset (two or more affected people or communities claim that the affected asset is theirs)
- Successions, divorces, and other family issues resulting in disputed ownership or disputed shares between inheritors or family members
- Where affected people opt for a resettlement-based option, disagreement on the resettlement package (the location of the resettlement site does not suit them, proposed housing, or resettlement plot characteristics. Agricultural potential is not adequate in their view
- Issues related to voluntary land donation; and gender related issues including Gender Based Violence (GBV), SEA/SH at construction sites.
- Disputed ownership of businesses and business-related assets (quite usually, the owner and the operator of a business may be distinct individuals, which give rise to dispute in the event of compensation).

5.3   GM structure

This proposed SOCO Project will adopt a similar structure to the GM of the Ghana Productive Safety Net Project 2 (GPSNP 2, P175588) which relies on a Single Window Citizen Engagement Service (SWCES) for addressing and the resolution of complaints.

The process for the operationalisation of the SWCES under the SOCO-Project is as follows:

First, the SOCO Project will operationalise the SWCES by sensitising all beneficiaries, key actors, and stakeholders in general to channel all grievances and concerns to the SWCES Call Centre to be established for speedy redress.

At the regional and district and community levels, the PIU and its Field Officers will be responsible in ensuring that all beneficiaries and key actors know the number(s) to the Call Centre by posting them on the Transparency Accountability Boards that will be provided and ensuring total disclosure and dissemination. The Environmental and Social Safeguards Officers will be designated at the PIU to take responsibility for the case management.

- The PIU, will in effect, prioritise issues related to the SWCES and the opportunities it presents in its Public Information Campaigns (PIC) to ensure its effective and widespread utilization. In this regard, the Project shall continue to explore opportunities for wider disclosure and dissemination to beneficiaries and stakeholders for enhanced visibility and easy access.
- All cases received by the SWCES in relation to the SOCO project shall be referred to the PIU Regional Antenna for redress. The Safeguards and Case Management Officer (SCMO) that will be stationed at the PIU will be directly responsible for all grievances that will be referred from the SWCES. There shall also be dedicated officers in the various PIU Zonal Offices who will be expected to lead in the resolution of all cases related to the project within the Zones.
- Upon receipt of a grievance/complaint from the SWCES, the SCMO shall employ the internal processes/mechanisms at the various levels as outlined below by referring the case in question to the appropriate level/structure and follow up to ensure a satisfactory resolution of the said complaint. Once a case is resolved, the SCMO shall relay the outcome/resolution to the SWCES to enable the latter complete the feedback loop. The SCMO will thus be the focal point for Case Management at the PIU and serve as the official link between the RPCU and the SWCES.

The operationalisation of the SWCES for addressing and the resolution of complaints will take place at 4 different levels. The 4 different levels are: *Community, District, Zonal and National*. All complaints, investigations and resolutions will be clearly documented through a Case Management Form (CMF) that will be developed by the PIU. All forms will be submitted to the SCMO once the complaints are resolved, and feedback provided to the complainant. All complaints should be investigated, resolved, and feedback communicated to the complainant within a maximum of **3 weeks** from when the complaint was made. The SCMO will then follow up with an independent inquiry to the complainant (by phone, text, or through the CF) to verify whether the complaint has been satisfactorily resolved. Once a satisfactory resolution has been confirmed, the case is updated in the SWCES and closed. If the complainant is not satisfied with the resolution of the case, he/she will be informed about the appeals process to escalate the complaint to the next level.

The structures responsible for grievance redress across the various levels of implementation are presented as follows:

a. **Community level**
- At the community level, the CFs will serve as focal point for resolution of Project-related grievances. The CFs shall serve as liaisons between the community and the various levels and relevant interest groups in ensuring the speedy resolution of all cases that will emerge.
- To investigate and resolve minor cases that can be handled at the community level, a 3-member Case Management Committee will be appointed. This committee which may be drawn from the Unit Committee shall comprise:
  - A representative of the Traditional Ruler
  - A women's representative
  - A male Opinion Leader (preferably a member of the Unit Committee/Assembly member or leader of the dominant religious sect).

The project target area must be given the opportunity to validate the membership of the 3-member Case Management Committee.

b. **District level**
At the district level, the Head of the Social Welfare and Community Development Department (SWCDD) would act as a Focal Point for Project-related Cases. He/she would be required to present all SOCO-Project related complaints that must be addressed at the district level to the statutory District Public Relations and Complaint Committee. The head of the SWCDD will then ensure that the Committee investigates the complaint, pursues adequate resolution, and communicates the feedback to the complainant. The full case and resolution should be documented in the CMF by the head of the SWCDD and submitted through the Zonal Coordinator to the SCMO.

c. **Zonal level**
There shall be assigned to each ZCO, a Case Management Assistant who will receive all SOCO-Project related complaints that may be referred to the Zonal Office through the SWCES. He/she would be required to follow up and ensure the resolution of these complaints and report on same. The case in question and the resolution thereof should be documented in the CMF by the Case Management Assistant and submitted through the Zonal Coordinator to the SCMO.

d. **National level**
The SCMO at the RDCU will be responsible for the overall Case Management process of the Project. He/she would be required to enter all cases, their investigation, and resolutions received from the community, district, and zonal levels into the SWCES. The SCMO will also be required to follow up and ensure the resolution of complaints that should be investigated and resolved at the national level. The case in question and resolution arrived at should be documented in the CMF by the SMCO and feedback transmitted to the SWCES.

The Help Line of Hope offers the opportunity to also receive cases outside SP programs, including reporting gender-related cases. It is envisaged that alongside the GPSNP2, the SOCO Project will also support the decentralisation of the SWCES to all the 6 regions of the targeted areas and also become a national single-entry point for PIU and implementing partners.

Under the GPSNP and with this SOCO Project, the SWCES is being extended to the district level through preparation of manuals, rules, and guidelines to define the roles and

responsibilities of Community Facilitators (CF), District Planning Coordinating Units (DPCUs), and District Social Welfare and Community Development Officers in the receipt, follow-up, and resolution of cases. Hence, mirroring GPSNP 2, case receipt on this SOCO Project will rest with the SWCES national team, supported by decentralized staff who will have the following functions: (a) raising awareness on GMs (including for SEA/SH); (b) lodging grievances on behalf of beneficiaries or other community stakeholders; (c) following up on cases or making additional inquiries as requested by the SP programs; (d) supporting the communication of outcomes of cases to complainants as appropriate, and (e) following up on unresolved cases. Steps followed by the SWCES are:

- Receive and register grievances or complaints
- Acknowledge, assess and assign (Acknowledge receipt of grievance, outline how grievance will be processed, assess eligibility, and assign responsibility)
- Propose response
- Agreement on response
- If agreement is reached, implement agreement
- If agreement is not reached, review case

The GM will not prevent access to judicial or administrative remedies.

The SWCES Officer receiving the complaint shall respect the complainant's wishes, choices, rights, and dignity when receiving a grievance/during the intake process. The Grievance Focal Person must obtain their permission of the complainant to exchange basic data for monitoring data. In order for the complainant to consent to submit a complaint, he or she must be given clear and basic information on how the system works, the possible results, the timetables, the types of support that can be provided, and so on, so that they can make an informed decision.

In SEA/SH instances, it's critical to make the complainant's/ survivor's access to the complaints process as simple and secure as feasible, and for their anonymity/ confidentiality to be kept. No more than three aspects of the GBV occurrence should be requested or recorded by the SWCES Officer:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- The age of the survivor.
- If, to the best of their knowledge, the perpetrator was associated with the project.

The GM shall also receive, register, and address concerns and complaints related to SEA / SH in a safe and confidential manner, with specific entry points for survivors and ensure a referral system to provide assistance to survivors as required, through identified GBV service providers in the Project area (with the support of trained Social Welfare Officers and officials of the Domestic Violence and Victim Support Unit etc). Provision of assistance to survivors of SEA / SH for medical care, psychosocial support, and legal assistance by way of referral to relevant SEA/SH service providers in the Project area within 48 hours. The reporting of SEA / SH cases shall be based on the principle of confidentiality and security of the survivor's identity and shall be kept in a secure location with limited access.

Complaints received and logged electronically will be transferred by the SWCES Officer to the Project's Social Safeguards Officer electronically (through the Unified Case Management System). The Social Safeguards Specialist will also serve as the Project's Grievance Focal Person.

After receiving and reviewing the case, the Social Safeguards Specialist, will forward it electronically through the online system (UCMS) to the respective case management assistant located in the Project's regional antenna in whose jurisdiction the grievance emanated. The Case Management Assistant will then notify the aggrieved person, through a phone call (Complainant) of the receipt of his/her complaint.

Communication between the Case Management Assistants, the Districts', and Communities' focal persons, on the resolution of the case will be means of telephone. Any feedback received by the Case management Assistant from them in this regard will, however, be uploaded unto the UCMS.

All communications between the various key actors – SWCES, the Social Safeguards Specialist, and the Case Management Assistants regarding grievances lodged will be done via the UCMS. In addition, communication received by the Safeguards Specialist or the Case Management Assistants from the Districts' and Communities' Focal persons on grievances lodged will also be uploaded unto the UCMS. Grievances will be assessed and tiered accordingly for follow up action.

5.3   Recommended Grievance Redress Time Frame

As much as possible, the SWCES uses electronic data collection and recording tools to reduce the costs of reporting, expand the capacity to monitor, and improve communication flows from the community level to the national level. The UCMS thus allows data to be captured electronically and for smooth compilation of reports. The table below generally presents the recommended time frames for addressing grievances or disputes received related to SP Programs.

The table below shows the recommended time frames for resolving project-related grievances or disputes in general.

Table 5: Proposed GM Time Frame

Step	Process	Time frame
First Tier: Project Level- Grievance Redress Team/ Local Mediation Committee		
1	Receive and register grievance	within 24 hours
2	Acknowledge, assess grievance, and assign responsibility	within 24 hours
3	Discuss and determine redress action (Development of response)	Within 2 Days
4	Implementation of redress action or response if agreement is reached	Within 3 days

Step	Process	Time frame
	Initiate a grievance review process if no agreement is reached at the first instance	Within 24 hours
5	Verify the redress action	Within 5 days of first grievance registration
6	Close grievance	within 24 hours after step 5 Grievance is also closed upon mutual agreement with the complainant that the response and resolution are satisfactory
Second Tier: Municipal Assembly Level- Public Relations and Complaints Committee		
7	Initiate and complete grievance review and resolution process if no agreement is reached at the first instance by the effort of the Grievance Redress Team	within 3 Days from date of receipt at review level
Third Tier: Ministry Level – Social Accountability Unit		
8	Initiate and complete grievance review and resolution process if no agreement is reached at the second instance by the effort of the PRCC at the Municipal Assembly	within 5 Days from date of receipt at Ministry level
Court of Law		
9	Grievance taken to court by complainant	Unknown

5.4   Capacity building trainings for GM Committee

In terms of GBV/SEA, all GM Focal Persons should be aware of GM protocols and mechanisms for reporting claims of GBV/SEA. Most crucially, focal persons should be trained (and/or have prior knowledge and experience) on GBV Guiding Principles, including those of confidentiality and safety of complainants/survivors, and on the survivor-centered approach, in order to fulfil their role in addressing GBV. This set of skills will assist GM Focal Persons in supporting the quality of the complaint mechanism while also assuring adherence to GBV Guiding Principles and a survivor-cantered approach to complaint intake and management, including the right to safety, respect, and confidentiality.

5.5   Promotion of the GM

Communications on the GM structure and procedures will be part of the proposed project overall communications strategy. Meetings, monthly information pamphlets and posters detailing the GM process in languages understood by employees, and one-on-one meetings during recruitment will be used to spread information on the many routes to report grievances, complaints, and concerns. Inside each working location, such posters will be displayed, and suggestion boxes will also be available. Meetings will be held at least once a quarter, with notifications posted on bulletin boards.

Project beneficiaries with disabilities should be able to use GM. It should be presented to these recipients in a clear and understandable manner (braille, simple and large font writings, infographics, audio or assisted). To guarantee efficient communication of the GM, consult with disability associations and service providers (schools for people with impairments). It is critical to raise awareness of the needs of people with disabilities among GM structures.

5.6   Grievance Documentation and Reporting

The UCMS is designed to capture data on all cases received and resolved. Resolved and escalated grievances/cases are documented daily in the system with unique IDs generated for the assigned Case Management Officer. Cases received are then directed to the relevant programs for resolution and the process for resolution subsequently tracked. Monthly case/ grievance reports are generated from the system by the Case Management Officer and reports shared with the Project Coordinator to inform management decisions. Quarterly reports are also be generated and reported to the MOF as part of the project's Progress Reporting to the World Bank. Periodic reports are generated within a reasonable time frame for stakeholders, as appropriate, upon request.

6.0   MONITORING AND REPORTING

This Chapter discusses the monitoring and reporting framework for the Stakeholder Engagement Plan. Monitoring and Tracking of Stakeholder Engagement is important to ensure effective and continuous engagement and follow-up and to minimise slippages and oversight of important engagements.

The Stakeholder Engagement Plan will be periodically revised and updated as necessary during Project implementation. This will help to ensure the validity and adequacy of the information presented herein, and that the identified methods of engagement remain appropriate in relation to the ESS10 requirements and specific phases of the Project development. Any major changes to the Project activities and to its schedule will be duly reflected in the SEP

The PIU will maintain a Stakeholder Engagement Log that chronicles all stakeholder engagement undertaken or planned. The Engagement Log will include location and dates of meetings, workshops, and discussions, and a description of the project-affected parties and other stakeholders consulted. There will be annual reporting of the SEP as part of the project monitoring report. The Project will also develop an evaluation form to assess the effectiveness of every formal engagement process. The questions will be designed as appropriate for the relevant audience.

A few Key Performance Indicators (KPIs) will also be monitored by the PIU on a regular basis in relation to the engagement measures proposed in this SEP, including the following indicative parameters:

- Number of public fora, consultation meetings and other public discussions/forums conducted within a reporting period (e.g., monthly, quarterly, or annually);
- Frequency of public engagement activities.
- Number of external public grievances received within a reporting period (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; the various categories of grievances received, etc.
- Type of public grievances received, including those submitted by representatives of the project communities or directly relating to their traditional activities and lands used by the local population.
- Number of press materials published/broadcasted in the local, regional, and national media; and
- Cost of stakeholder engagement activities as percentage of overall project cost

7.0   MANAGEMENT OF SEP IMPLEMENTATION

7.1   Institutional Arrangement

The institutional arrangement discussed in this chapter is based on preliminary discussions held on the project management structure. It is important to note that the SEP is considered a "live" document, hence, subsequent changes in the project design will engender a modification of the SEP.

7.1.1 National Steering Committee (NSC)

The NSC, expected to meet twice every calendar year, will be responsible for providing the strategic direction of the project and approving the annual work plan and budget. At each of the meetings, presentations on the progress of wok, including implementation of the SEP, and the cost requirements will be made by the PIU to the NCS for the approval of the budget. Justification for the approval of the cost component of the SEP in the budget will be made.

7.1.2   National Technical Committee (NTC)

The NTC, will provide technical guidance for the implementation of project components and provide opportunity for achieving effective collaboration and synergies with other implementing ministries, departments and agencies covering the relevant sectors of the project to ensure consistency of project development objectives with sectoral policies. Similar to the NSC, membership will be drawn from many of the project's stakeholders such as the Ministry of Gender, Children and Social Protection, Ministry of Youth and Sports, Ministry of Food and Agriculture, National Development Planning Commission, Ghana Immigration Service, National Disaster Management Organisation, and the Northern Development Authority. With members drawn from different organisations, the NTC will foster stakeholder engagements with the different stakeholders identified for engagement in the ESP. Presentations made to the NTC by the PIU will include progress on the SEP implementation.

7.1.3   Project Implementation Unit

The PIU shall oversee and coordinate the implementation of the Project. It shall have a project coordinator, supported by some key subject area specialists such as a procurement, Financial Management specialist, MIS, M&E, Environment Specialist, social safeguards, gender, and GBV specialist; infrastructure specialist, local economic development specialist; one youth development specialist; capacity-building specialist; communication specialist; and support staff.

The Social Safeguards Specialist (SSS) will provide technical guidance for the implementation of the SEP during project implementation and shall be supported by the other key specialists, especially the communications specialist. The SSS shall present monthly and quarterly reports on the SEP implementation as part of his overall Social Safeguards Reports to the Project Coordinator.

7.1.4   Municipal/District Assemblies

At the local government level, the District Assembly will be responsible for the implementation, supervision, and monitoring of project activities. The District Planning Coordinating Unit (DPCU), with co-opted members (as needed), will support the District Assemblies in the management of project activities in their respective Districts. District Development Planning Officer, as the Secretary to the DPCU, will be the focal lead for the implementation of project activities.

Throughout the life cycle of the sub-project, the districts will be responsible for community sensitisation and promoting community-level engagement. The social welfare and community development officer, supported by the District Planning Officer will be responsible for the implementation of part of the SEP that requires engagements with the project communities. They shall have copies of the SEP and provide regular reports to the PIU on SEP implementation activities in their respective jurisdictions.

7.1.5   Community level

With the help of the Unit Committees, the Community Facilitators (who will be appointed/recruited particularly for the project) will support the District Assemblies to facilitate the engagement of community level actors. They will liaise between the District Assemblies and the communities on all stakeholder engagement activities to be undertaken at the community level. The Community Facilitators will be responsible for arranging for venues, informing the community members, and playing any other facilitation role that may be required. Each community facilitator will be required to record stakeholder engaging activities undertaken in his community.

7.2   Financial Resources

It is estimated that an amount of Six Hundred and Sixty Thousand, Five Hundred Dollars (USD660,500) will be required for the implementation of the SEP. Table 6 below provides an indicative budget for the implementation of the SEP during the entire project implementation period.

The preparation of the Annual Workplan and budget will factor in stakeholder engagement activities to be undertaken under the project. The budget will make estimates for the cost of the various stakeholder engagement activities at all levels - National, District and Community levels. At the National level, the Social Safeguards Specialist who will be responsible for engaging national-level stakeholders, will make requests to the Project Coordinator, based on the approved budget to enable him/her undertake stakeholder engagement activities – workshops, meetings, development and printing of flyers and brochures, radio programmes, etc.

Similarly, the Development Planning Officers at the District Assemblies, who will serve as the Project's focal persons at the district level will, at the beginning of each project implementation year, present a budget to the PIU for stakeholder engagement activities (with reference to the SEP). The budget will then be reviewed. The Officers will be required to submit reports on all SEP activities undertaken within a reporting month as part of their Progress Reports to be submitted.

Nonetheless, the PIU's Social Safeguard Specialist will be the main person responsible for the overall implementation of the SEP. He/she will be supported in the execution of the SEP by the Environment Specialist, communications specialist, as well as local structures in the intervention areas (e.g., the Development Planning Officers, unit committee representatives and community facilitators).

Table 6: Budget for operationalising the SEP

Stakeholder Engagement Activities	Q-ty	Unit Cost, USD	№ of years	Total cost (USD)
Communication materials (leaflets, flyers, posters, public relation kits including design etc.)				30,000
Community Facilitation (5 years x USD 1,000 per year * 63 Districts)	63	1,000	5	315,000
Operationalisation of for stakeholder engagement activities (cost per year) e.g., travel expenses, meeting cost		10,000	5	50,000
Conferences/ workshops for National level stakeholders (Ministries, Departments and Agencies)	2	10,000	5	100,000
Project press conferences (Once a per year)	1	1000	5	5,000
Engagement with Parliamentarians (select committee)[3]	1	20,000	5	100,000
Subtotal				600,500
Contingency				60,000
GRAND TOTAL				**660,500**

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[3] This is part of the annual budgeting cycle where Parliament needs to be engaged to approve credit for Project implementation.

8.0   REFERENCES

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Appendix

Consultation with the Upper East RCC

Consultation with Kalijisa Community, Builsa North District

Consultation with the Builsa North Municipal Assembly, UE Region

Consultation with North-East RCC

Consultation with the West Mamprusi Municipal Assembly, Walewale

Consultation with the Chief and People of Guabulga, West Mamprusi District

Consultation with the Unit Committee members and Opinion leaders of Tinguli, West Mamprusi District, NE Region.

Consultation with the East Gonja Municipal Assembly

Consultation with Grunshie-Zongo Community, East Gonja District

Consultation with the Chief and People of Kpalbusie, NE Gonja District,

Savannah Region.

Consultation with the Chief, elders and unit committee members and Assembly
 man of Sisipe, East Gonja District, Savannah Region.