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Recovery of Economic Activity for Liberian Informal Sector Employment

Draft Stakeholder Engagement Plan

Ministry of Youth and Sports
Liberia Agency for Community Empowerment

Republic of Liberia

Contents

Executive Summary.....	5
1.Introduction/Project Description.....	6
1.2 Description of REALISE Project.....	6
1.3 Project Implementation Management and Coordination	7
1.4 Objectives of the SEP	8
2. Previous Stakeholder Engagement Activities	9
2.1 National legal frameworks	10
2.2 World Bank Requirements	10
3. Stakeholder Identification and Analysis.....	11
3.1 Project Affected Parties (Primary Stakeholders)	11
3.2 Other interested parties	11
3.3 Disadvantaged/vulnerable individuals or groups	12
4. Stakeholder Engagement Program	13
4.1 Purpose of Stakeholder Engagement Activities and Timing	13
4.2 Proposed Strategy for Information Disclosure	16
4.2.1 Objective	16
4.2.2 Engagement Methods and Tools	16
4.2.3 Description of Engagement Methods	17
4.2.4 Adaptation to COVID-19	17
4.3 Proposed Strategy for Consultation.....	23
4.4 Proposed Strategy to Incorporate Views/Opinions of Disadvantaged and Vulnerable Groups.....	25
4.5 Review of Comments	26
5. Grievance Mechanism (GM)	26
5.1 Categories of Potential Complaints and Grievances.....	26
5.2 GRM Standards and Principles.....	27
6. Monitoring and Reporting Plan.....	29
6.1 Monitoring Plan	29
6.2 Key Performance Monitoring Indicators.....	29
7. Resources and Responsibilities for implementing stakeholder engagement activities	30
7.1 Resources	30
7.2 Management functions and responsibilities	31
Annex 1: COVID- 19 Health and Safety Guidelines	32

List of Tables

Table 1 Summary of Previous Stakeholder Engagement Activities9

Table 2: List of stakeholders at different levels in accordance with project components12

Table 3: Summary of Stakeholder Engagement Activities and Timing14

Table 4: Methods for Stakeholder Engagement18

Table 5: Summary of information disclosure at different stages of the project21

Table 6: Summary of key consultations and methods to be employed24

Table 7: Budget estimate for SEP implementation.....30

ACRONYMS AND ABBREVIATIONS

CBO	Community Based Organization
CERC	Contingency Emergency Response Component
COC	Community Oversight Committee
COVID-19	Corona Virus Disease 2019
CSC	County Steering Committee
EPA	Environmental Protection Agency
EPML	Environment Protection and Management Law
E&S	Environmental and Social
ESF	Environmental Social Framework
ESS	Environment and Social Standard
ESCP	Environmental and Social Commitment Plan
ESMF	Environment and Social Management Framework
FGD	Focus Group Discussion
GBV	Gender-Based Violence
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IA	Implementing Institution
LACE	Liberia Agency for Community Empowerment
LHSR	Liberia Household Social Registry
LIBA	Liberian Business Association
LIPW	Labor-intensive public works
LMA	Liberia Marketing Association
LMP	Labor Management Procedure
LRA	Liberia Revenue Authority
LYEEP	Liberia Youth Employability and Empowerment Platform
M&E	Monitoring and Evaluation
MCI	Ministry of Commerce and Industry
MFDP	Ministry of Finance and Development Planning
MGCSF	Ministry of Gender, Children and Social Protection
MIA	Ministry of Internal Affairs
MIS	Management Information System
MoA	Ministry of Agriculture
MoH	Ministry of Health
MoL	Ministry of Labor
MPW	Ministry of Public Works
MYS	Ministry of Youth and Sports
NCD	National Commission on Disability
NGO	Non-Governmental Organization
PAD	Project Appraisal Document
PESS	Pre-Employment Social Support
PIU	Project Implementation Unit
PW	Public Work
PSC	Project Steering Committee
PMT	Project Management Team
RAP	Resettlement Action Plan

RCCE	Risk Communication and Community Engagement
REALISE	Recovery of Economic Activity for Liberian Informal Sector Employment
RPF	Resettlement Policy Framework
SBS	Small Business Support
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SGBV	Sexual and Gender-Based Violence
YOP	Youth Opportunities Project
WB	World Bank

Executive Summary

This Stakeholder Engagement Plan (SEP) has been developed by the Government of Liberia through its project implementing entities [the Ministry of Youth and Sports (MYS) and the Liberia Agency for Community Empowerment (LACE)] to maintain and ensure the process of continuous engagement with the different stakeholders in the course of implementation of the Recovery of Economic Activity for Liberian Informal Sector Employment (REALISE) project. The process of engaging stakeholders is important for successful implementation and attaining the goal of the project. During the preparation stage of the SEP, a series of stakeholder consultations were undertaken to pave the way for constructing a robust stakeholder engagement plan for this project.

REALISE is designed to increase access to income earning opportunities for the vulnerable in the informal sector in response to the COVID-19 crisis in Liberia. The project has four components including the following: (i) Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses, (ii) Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers, (iii) Component 3: Program Implementation, Capacity Building and Coordination, and (iv) Component 4: Contingency Emergency Response Component (CERC). The project builds on the implementation experience of Youth Opportunities Project (YOP).

The project environmental risk is rated as *Moderate*, while the social risk is rated as *Substantial*. The project risks and impacts will arise mainly from project component 2. Social risks that could likely emerge during implementation of subprojects include: i) claims and complaints about targeting/recruitment and selection of subprojects, ii) inclusion of people who are well connected as beneficiaries to the project, iii) exclusion of people who are not well connected as beneficiaries to the project, iv) lack of transparency on grants and payments, v) poor service delivery including delays, vi) unfair treatment by service provider/project staff, vii) and discrimination based on sex or other physical and health conditions, viii) discrimination because of gender orientation and ethnicity, ix) failure to meet minimum wage expectations. It is also likely that temporary restrictions on land use, loss of property, disruption of access paths, corrupt practices, human rights violations, child labor, and sexual exploitation and abuse are among the potential social risks that may arise during implementation of subprojects and that need to be monitored closely. These risks can be readily managed if the project put in place qualified Environmental and Social (E&S) staff. Several instruments, including ESMF, ESMP, RPF, and RAP (if required) will be prepared and implemented throughout project implementation to mitigate project risks and impacts.

The identification and analysis of stakeholder groups for REALISE Project include government agencies, development partners, Civil Society and Non-Governmental Organizations, targeted project beneficiaries in urban areas, unemployed youth, women groups, Association of People with Disabilities, and interested people from local communities. This stakeholder engagement plan will also set out details of the purpose, timing and methods of stakeholder engagement and strategy for information disclosure. It will incorporate the view of vulnerable groups.

A provisional budget for implementing SEP activities has been included in the draft SEP. An estimated amount of US\$79,000.00 (Seventy-nine thousand US Dollars) will be required for SEP implementation and GRM operating costs.

1.Introduction/Project Description

The Liberia Recovery of Economic Activity for Liberian Informal Sector Employment (REALISE) is a social protection project under the Ministry of Youth and Sports (MYS) and the Liberia Agency for Community Empowerment (LACE) of the Government of Liberia with support from the World Bank. The project is designed to increase access to income earning opportunities for the poor and vulnerable population mostly dependent on the informal sector. The objective of the project is to increase access to income earning opportunities for the vulnerable in the informal sector in response to the COVID-19 crisis in Liberia. This includes vulnerable individuals or households in the informal sector that are poor and/or are at risk of falling into poverty due to the impact of COVID-19 on their livelihoods. The REALISE project has four components (1) Grant Support to Vulnerable Households to Revive or Start Small Businesses, (2) Temporary Employment Support and Employability Development for Vulnerable Workers, (3) Program Implementation, Capacity Building and Coordination, and (4) Contingency Emergency Response.

The implementation of REALISE will involve many stakeholders including different groups of beneficiaries, ministries, local government authorities, Non-Governmental Organization (NGOs) and Community Based Organizations (CBOs). A clear understanding of the nature, interests and concerns of such stakeholders is crucial for effective design and delivery of the project. This is followed by the establishment of systems at each level that will include 1) support for stakeholder engagement in targeting, 2) selection of beneficiaries, 3) cooperation on addressing the needs of the most vulnerable, including the homeless & jobless, 4) appeals and grievance processes, and 5) information disclosure guided by the World Bank **Environmental Social Standard** (ESS10).

1.2 Description of REALISE Project

The REALISE Project is a social protection project of the Government of Liberia with support from the World Bank. The project is designed to increase access to income earning opportunities for the vulnerable in the informal sector in response to the COVID-19 crisis in Liberia. The project has the under listed four components:

Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses

This component aims to provide support to vulnerable small businesses in the informal sector. The component will support business maintenance and recovery/development with grants and training to existing vulnerable (temporarily closed or at risk of closure) informal small businesses. It will also provide technical support and grants to new small businesses in the informal sector in urban areas (in the second phase of the project). The component will also finance a range of support services, including business skills and development training, and mentoring and will actively promote engagement of women in higher productivity (sometimes referred to as 'male-dominated') sectors to promote higher earnings among women.

Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers

Component 2 will provide temporary employment and employability development for vulnerable workers struggling to find gainful employment and opportunities during and after the COVID-19 crisis through community-based public works activities. It will seek to: i) sustain consumption levels of vulnerable households; ii) build employability and life skills of individuals from vulnerable households to improve economic inclusion and increase wellbeing; and iii) increase economic, environmental and social benefits for communities by strengthening community assets. Labor-intensive public works (LIPW) in urban areas will facilitate reentry into productive employment while improving environment and general living conditions for the poor and vulnerable in urban areas.

Component 3: Capacity Building and Program Implementation and Coordination

This component will support government and other actors' capacity strengthening for the coordination, design, and implementation of the project. These will include administrative, technical, and financial management of the project by Project Management Team (PMT), Coordination among all institutional partners to ensure the efficient flow of information among all actors, and coordination with the private sector. The component will also support establishment of monitoring and evaluation mechanism of the project's results and impact, development of communication activities to publicize and disseminate project results, best practices, and success stories, Studies, and impact evaluations.

Component 4: Contingency Emergency Response Component (CERC)

The component has provision of zero amount to allow for rapid reallocation of loan proceeds from other project components during an emergency.

REALISE will also consider cross-cutting priorities to include Gender, Environment, and Climate change.

All components will have a strong gender focus aimed at addressing gender gaps in labor market outcomes as well as mitigate risks of Sexual and Gender-Based Violence (SGBV), and endeavor to minimize risks which could arise from supporting types of activities that may use environmentally damaging technologies and/or beneficiaries potentially starting or expanding businesses that may affect the environment.

1.3 Project Implementation Management and Coordination

The institutional arrangement for implementation of REALISE will be fully streamlined into the existing government structure and implemented at national, county, and district levels. The Ministry of Youth and Sports and Liberia Agency for Community Empowerment are the main project implementing institutions (IAs) working in close collaboration with several key implementing partners, including Ministries of Labor; Internal Affairs; Gender, Children and Social Protection; Public Works and Environmental Protection Agency (EPA). The Project Management Team (PMT) under MYS and LACE will be responsible for overall implementation and coordination of the project. The project implementation structures build on the implementation experience of the Youth Opportunities Project (YOP).

- **Component 1:** Grant Support to Vulnerable Households to Revive or Start Small Businesses will be implemented by LACE,
- **Component 2:** Temporary Employment Support and Employability Development for Vulnerable Workers will be implemented by MYS,
- **Component 3:** This component will support government and other actors' capacity strengthening for the coordination, design, and implementation and will be implemented jointly by LACE and MYS.

The MYS will take the overall responsibility of ensuring the effective implementation of this project. MYS is in charge of the youth agenda and by virtue of job creation being at the top of this agenda, it has also played a leading role in rallying various governmental and non-governmental stakeholders on the issue of job creation. For effective implementation, MYS will outsource execution of one of the activities to LACE which has more experience with interventions targeting micro- and small enterprises (SBS) under YOP. MYS has experience of implementing public works projects in Greater Monrovia under the Liberia Youth Employment Program (LYEP) and its Beach and Waterways Cleaning Program. MYS will take the lead on inter-ministerial coordination with other government agencies relevant to the job creation agenda.

LACE has an established track record of delivering employment focused programs in Liberia. LACE is a not-for-profit and autonomous agency, established by the GoL in 2004 and is accountable to the Executive

Branch of the government. LACE's mandate is to improve living standards for poor communities while promoting community-inclusive development processes. LACE has a history of implementing a series of employment projects financed by the World Bank, including the Community Empowerment Projects I and II, the Youth Employment Support Project (YES), and Cash for Work Temporary Employment Project (CfWTEP). More recently, LACE has been implementing SBS and a rural public works program under YOP.

Project Management Team (PMT). Following experience of YOP, there will be a single PMT consisting of consultants hired by MYS and LACE to oversee the overall implementation of the project. The PMT will coordinate project implementation, including organizing regular Project Steering Committee meetings. The PMT will also be responsible for developing all guidelines, establishing appraisal mechanisms, and working collaboratively with the implementing agencies to ensure consistent and regular flow of information between internal and external audiences. The PMT will comprise coordinator, key technical staff, fiduciary specialists who will be responsible for all financial management and procurement related activities under the project, and safeguards specialists (Environmental Officer and Social Safeguard Officer) to support, monitor and report on implementation of the Environmental and Social Commitment Plan (ESCP). Implementing agencies will contract experienced/qualified non-governmental organizations (NGOs), local firms, or other organizations to support implementation of some aspects of the activities, especially those related to non-financial support provided to the enterprises, life-skills training and other support under the public works.

Project Steering Committee (PSC). The PSC will be established to provide oversight to the project implementation. The PSC will be responsible for approving the Annual Work Plans and Budgets (AWP&B) and taking action on issues that require high-level decisions. The PSC will be chaired by the minister for MYS or a designee, and comprise, inter alia: representatives of MYS, LACE and Ministry of Finance and Development Planning (MFDP).

1.4 Objectives of the SEP

The SEP provides a framework for stakeholder engagement throughout the life of the project cycle (identification, preparation, appraisal, negotiation, completion). The SEP has been designed so that the project can demonstrate engagement that is effective, meaningful, consistent, comprehensive, coordinated and culturally appropriate in line with ESS10 objectives and requirements, all the relevant Liberian legal and regulatory framework and good international industrial practice. Specific objectives of the SEP include the following:

- To establish a systematic approach to stakeholder engagement that will help the Government of Liberia, through its project implementing entities, identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the MYS and LACE to respond to and manage such grievances.

2. Previous Stakeholder Engagement Activities

A slew of stakeholder consultations, both formal and informal will take place during the design and implementation of the project. Stakeholder engagement for the REALISE Project started early at project identification to allow stakeholders' views and concerns to be considered in the project design. Further stakeholder engagements will be undertaken during the preparation of the Environment and Social Management Framework (ESMF), Environmental and Social Management Plan (ESMP), Resettlement Policy Framework (RPF) and Resettlement Action Plan (RAP), if required, and Gender Based Violence Risk Assessment (GBV), which sought to identify potential environmental and social impacts including GBV from the proposed project activities, and to disseminate and disclose proposed mitigation measures.

The findings from these exercises confirmed that overall, the project will achieve considerable beneficial environmental impacts because the emphasis on supporting types of activities will be not on just minimizing negative environmental impacts but also promoting enterprises that will have positive impacts. The beneficial impacts will include cleaner air and improved aesthetics in the beneficiary cities, improved hygiene condition, flood reduction and better quality of the environment as a result of improved waste management and decline in the prevalence of diseases whose transmission is linked to poor sanitation. However, environmental issues could arise from activities that may use environmentally damaging technologies and resources mainly for the activities involved in component 2, which may affect the environment adversely. The risks emerging from these activities (including public works) are likely to range from pollution of land, ground and surface water (if wastes are improperly disposed of), air pollution/climate contamination (burning of disposed wastes/GHG emission from decomposing waste at waste disposal sites) and harm towards animal and marine life through contamination of the food chain. The project social risk was rated as substantial, while the GBV risk is rated as Moderate. Several instruments, including GBV Action Plan, Labor Management Procedures (LMP), ESMF, ESMP, and RPF will be prepared, adopted, and implemented throughout project implementation.

Table 1 Summary of Previous Stakeholder Engagement Activities

Stakeholder Group	Institutions	Method of engagement	Topic of Consultation/Main observations
Youth Sector Steering Committee	National government, and Donor Partners, the private sector, and youth representatives	Focus group discussion (FGD)	All issues related to the project including proposed project objective, components and activities The MYS and LACE as IAs explained the objectives and benefits of the project and provided clarifications related to beneficiary selection, project scope, and implementation timeline. Donor partners and other GoL representatives highlighted that the project is timely given the situation in the country. The youth representatives noted the same, however, expressed concerns about the issues facing the informal sector, which will be taken into account during project preparation. UNICEF suggested to ensure that

			the project design is sensitive to the inclusion of people living with disabilities.
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2.1 National legal frameworks

The Liberia Freedom of Information Act (2010) acknowledges that access to information is indispensable to genuine democracy and good governance. Article 15(c) of the Constitution of Liberia provides that no limitation shall be placed on the public right to be informed about the government and its functionaries. Government of Liberia has put in place structures and processes to promote participation, consultation, and grievance redress at local levels. The country’s organic laws recognize the rights of the vulnerable in society that require special attention. **The Social Protection Policy (2013)** recognizes vulnerable people to include children, older people, people with disabilities and chronically ill. Liberia has also ratified international conventions related to disability, women, and children’s rights.

Liberia has an Environmental Protection Agency (EPA) that is charged with implementing the Environment Protection and Management Law (EPML) of Liberia, a framework environmental law that envisions the development and harmonization of sector-specific laws, regulations and standards. EPA serves as the principal authority for managing and regulating environmental quality (including environmental and social impact assessments), and it is directed to coordinate all activities relating to environmental protection and the sustainable use of natural resources. It also promotes environmental awareness and oversees the implementation of international conventions related to the environment.

The EPML as well as the Environmental Protection Agency Act (EPA Act) and the EPA Environmental and Social Impact Assessment Procedural Guidelines provide for the participation of stakeholders at all levels of project implementation in order to ensure that their concerns and inputs are considered as part of the design, planning, project implementation and decommissioning. The law provides provision for public hearing, the platforms for complaints by aggrieved persons, and the opportunity to make comments and provide suggestion on project matters. Several sections of the EPML underscore the need for public consultation, public hearing, and identification of affected persons. For instance, Section 11 of the EPML, amongst other things, requires project proponent or applicant to conduct public consultations to be termed as "scoping" with the objective to Identify, inform and receive input from the effected stakeholders and interested parties.

2.2 World Bank Requirements

As defined by the Environmental and Social Framework (ESF) and ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for the successful management of a project’s environmental and social risks. As per ESS10 the process of stakeholder engagement will involve the following as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders. ESS10 also requires the development and implementation of a grievance redress (and feedback) mechanism that allows project affected parties and others to raise concerns and provide suggestions related to the environmental and social performance of the project, and other consequences as they affect them, and to have them addressed in a timely manner.

3. Stakeholder Identification and Analysis

There are three categories of Project stakeholders 1) project beneficiaries, 2) implementing agencies, and 3) other stakeholders. REALISE considers beneficiaries and project affected groups to be primary stakeholders, whilst implementing stakeholders includes implementing government ministries, development partners, Counties, sector offices and agencies, training and education institutions; and other stakeholders include those that are interested and have some influence on the project. These are private sector actors, civic and community organizations.

3.1 Project Affected Parties (Primary Stakeholders)

The primary stakeholders are all beneficiaries and the local communities who are expected to be targeted by the project interventions. Components 1 & 2 target the vulnerable members of the small businesses and others in the informal sector, which include women and children, unemployed youth, elderly groups, people with disabilities, homeless individuals and disadvantaged youth in selected urban communities in which the project aims to provide livelihood opportunities under the various project components. REALISE has identified target population and beneficiaries as stated below.

- Individuals or households in the informal sector that are poor or who risk falling into poverty due to the impact of COVID-19 on their livelihoods.
- Beneficiaries will be selected from low-income communities in Greater Monrovia, and those that represent households in the bottom three quintiles of national consumption distribution will be targeted based on a proxy-means test developed for the Liberia Household Social Registry (LHSR).
- Beneficiaries must be at least 18 years old. No other age or education restriction will be placed on participants, although given the distribution of the working age population in Liberia, it is expected that most beneficiaries will be under age 35.
- The project will be implemented in phases, with additional communities and beneficiaries covered under each phase.
- It is expected that the following vulnerable groups will be represented as part of the target group above:
 - Unemployed and disadvantaged youth between the ages of 18 and 35 with little or no education who lack the skills and work experience to attain gainful employment.
 - Elderly, physically challenged and undernourished individuals and households with constraints and whose survival depends on alms other informal activities.
 - Homeless people who lack access and opportunity to basic social protection services including support to social services, education, and economic integration.

3.2 Other interested parties

The project's stakeholders also include parties other than the directly affected communities, including:

- Residents of other urban communities within the project area, who can benefit from employment and training opportunities stemming from the project.
- Civil society groups and NGOs at the county, national, and local levels, that pursue environmental and socio-economic interests and may become partners of the project.
- Organizations within this group are likely to be located outside the project's direct area of influence.
- Business owners and providers of services, goods, and materials within the project area that will be involved in the project's wider supply chain or may be considered for the role of project's suppliers in the future.

- Government of Liberia – government officials, permitting and regulatory agencies at the national and county levels, including EPA, Liberia Revenue Authority (LRA), Ministry of Commerce and Industry (MCI), MGCSP, and MoL.
- Mass media and associated interest groups, including local, County, and national printed and broadcasting media, digital/web-based entities, and their associations.

3.3 Disadvantaged/vulnerable individuals or groups

A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the project. 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. Within the Project Area of Influence, the vulnerable groups may include and are not limited to the following:

- Elderly people
- Persons with disabilities and their caregivers/caregiver
- Low-income families
- Women-headed households or single mothers with underage children
- The unemployed persons.

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections. This section describes stakeholder engagement activities that will be implemented by PMT going forward, including activities tailored to the specific project phases/developments as well as the ongoing routine engagement.

Table 2: List of stakeholders at different levels in accordance with project components

Project Component		Stakeholders at National, county and district Level		
Component	Subcomponent Description	National level	County/City	District/Community
Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses	i) Business maintenance and recovery/development grants and training to existing vulnerable (temporarily closed or at risk of closure) informal small businesses; ii) Technical support and grants to new small businesses in the informal sector in urban areas (in the second phase of the project); iii) Actively promote engagement of women in higher productivity (sometimes referred to as ‘male-dominated’) sectors to promote higher earnings among women.	LACE, MYS, MCI, LIBA, LMA, LRA, MIA, WB, and other development partners	CSC, CBOs, and City Corporation	Community Leaders, Targeted beneficiary communities, unemployed youth, women groups, Association of People with Disabilities

Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers	i) Labor-intensive public works to smoothen consumption and facilitate reentry into productive employment while improving environment for the poor and vulnerable in urban areas; ii) Life Skills and Employability training (personal initiative, leadership, self-efficacy, confidence, time management, basic financial literacy, sexual and reproductive health, sexual exploitation, abuse and harassment at the workplace, and COVID-19 related material).	MIA, MPW, NCD, EPA, MYS, LACE, WB, and other development partners	CSC, City Corporations, CBOs	Target beneficiary communities, unemployed persons, women groups, and Association of People with Disabilities
Component 3: Program Implementation, Capacity Building and Coordination	i) Government and other actors' capacity strengthening for the coordination, design, and implementation; ii) Administrative, technical, and financial management of the project by PMT; iii) Coordination among all institutional partners to ensure the efficient flow of information among all actors and coordination with the private sector; iv) Establishment of monitoring and evaluation mechanism of the project's results and impact; v) Development of communication activities to publicize and disseminate project results, best practices, and success stories, and vi) Studies and impact evaluations.	MFDP, MYS, MIA, LACE, WB, and other development partners	CBOs, NGOs	The media, CBOs, local leaders

4. Stakeholder Engagement Program

4.1 Purpose of Stakeholder Engagement Activities and Timing

Stakeholder engagement is a continuous process and depends on the needs of the project. The table below outlines key stakeholder engagement activities at key stages in the project cycle preparation, launch, implementation and closing. Responsible agents for consultation at each stage also take the task of integrating the feedbacks from these consultations to inform project at each key stage. A combination of the methods above will be used to engage different stakeholders.

Table 3: Summary of Stakeholder Engagement Activities and Timing

Project Phase	Engagement Activity	Objective	Targeted Stakeholders	Time Frame
Project Preparation Phase	National stakeholder consultations	Collect views on the design of the project, target beneficiaries, environmental and social risks, mitigation measures, grievance redress mechanisms and SEP	Representatives of Government, Agencies and Departments Responsible for Implementation of the Project, Development Partners, and NGOs	During the preparation stage
	County/City and District level Stakeholders consultations	Collect views on the design of the project, identification of target beneficiaries, environmental and social risks, mitigation measures, grievance redress mechanisms and SEP	County/City Corporation, LRA, skills training institutions, Chamber of Commerce, business associations	During preparation stage
	Community level Stakeholder consultations	Collect views on the design of the project, targeting of project beneficiaries environmental and social risks, mitigation measures, grievance redress mechanisms and SEP	Ordinary members of the community, target beneficiary groups, such as women, youths, the elderly and disabled, Members of NGOs, CSOs, Community Organizations, Religious Leaders, Prominent business owners	During preparation stage
Project Launch	National project launch workshop with representatives of implementing agencies from participating counties	Awareness of stakeholders on key project features aspects including fiduciary and safeguard, roles and responsibilities and roll out plans	National project launch: County counterparts, Youth groups (FLY, LINSU, MRYP), Local NGOs, Development Partners, and WB	Launching of project

Project Launch in participating city	City project launch workshop	Explain key project features including fiduciary and safeguard, roles and responsibilities of each stakeholder, communication to beneficiaries and public	City corporations, MIA, CSC, chamber of commerce, business associations, business owners, Youth groups (MRYP, LINSU and FLY), NGOs, health service providers Elders, religious leaders, community leaders, CBOs, and women groups.	Launch of project
Project Implementation	Community/public mobilization and consultation	Mobilize and prepare target communities for project implementation, provide specific information on project plan, clarify expectations, agree on effective means for communication and outreach	CSC, District Offices, City Corporation and Members of target communities, Senior Citizens, associations of people with disabilities, religious and political leaders, marginalized groups, business owners, youth groups, schools, and health service providers	At the start of implementation of the project and will continue quarterly bases.
	Project implementation monitoring and supervision missions	Provide and obtain ongoing information on project performance	National, County, city, and community level stakeholders	Ongoing on quarterly/monthly basis throughout the project period
	Project review meetings with selected stakeholders from National, county, City, Development Partners (WB) and other relevant institution	Provide and collect periodic feedback on project implementation progress and identify and discuss new and emerging issues	County, City and Community level, Chambers of commerce and business associations, and business owners, Project Beneficiaries and stakeholders including Senior Citizens, People with Disabilities, Women and Youth Groups, NGOs, and CBOs	Quarterly throughout the project period
Project Close Out Phase	Project close out meetings	Engage stakeholders on project exit strategy	County, city/town administrations and local level stakeholders, beneficiary communities and women, youth groups, Persons with Disabilities.	End of the project year

4.2 Proposed Strategy for Information Disclosure

4.2.1 Objective

Information to be provided to stakeholders depends on the stage of the project and the needs of stakeholder. These include information on the nature of the project design, target beneficiaries, anticipated environmental and social risks and impacts, proposed mitigation measures, stakeholder engagement plan, grievance redress mechanisms.

A combination of communication methods shall be used to disclose information pertaining to the project to different set of stakeholders. At National and County level, disclosure of information shall be made through workshops and meetings with representatives of the various ministries and relevant agencies, development partners, indirect interested parties, and representatives. For city and community level stakeholders, information shall be disclosed through public meetings organized within the communities. Information disclosure at city and community level will consider literacy levels, language, and physical constraints such as visual impairments, hearing and speaking disability and mobility constraints. Deliberate efforts shall be made to ensure that vulnerable groups, such as women, youth, the elderly and disabled individuals, homeless individuals, and families are adequately represented, consulted and heard. Printed copies of relevant project documents shall be made available through appropriate and designated places within reach of stakeholders.

Moreover, radios, posters, brochures and social media platforms will be used under different conditions based on their suitability for outreach. Posters will be placed in visible public places such as local markets, churches/mosques, and schools.

Information disclosure to stakeholders includes disclosure of key project documents and reports of stakeholder consultation meetings. The latter include key information including agenda, participants, main issues raised, conclusions reached and proposed dates for next consultation meeting. The information disclosure shall be conveyed through appropriate means and depending on targeted stakeholder audience. Mostly, the project will use written forms of communication in the form of letters, flyers, announcements on community radio stations where available, and mobile phone text messaging systems. Where possible social media platforms and groups will be created to assist in information dissemination to targeted stakeholders. Alternative means for receiving feedback and comments on disclosed information will be specified in the disclosure.

4.2.2 Engagement Methods and Tools

The project intends to utilize various methods of engagement that will be used as part of its continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of various techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with statutory officials may be different from a format of liaising with the local communities (focus group discussions, displays and visuals with a lesser emphasis on technical aspects).

The format of every consultation activity should meet general requirements on accessibility, i.e. should be held at venues that are easily reachable and do not require long commute. There should be no preliminary access authorization. Consultations will ensure cultural appropriateness (i.e. with due respect to the local customs and norms) and inclusiveness, i.e. engaging all segments of the local society, including disabled persons, the elderly, minorities, and other vulnerable individuals. If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those

with insufficient financial or transportation means to attend public meetings scheduled by the project. Ensuring the participation of vulnerable individuals and groups in project consultations may require the implementation of tailored techniques. Since their vulnerable status may lead to people's diffidence and reluctance or physical incapacity to participate in large-scale community meetings, visiting such individuals/families at their homes or holding separate small group discussions with them at an easily accessible venue is a way for the project to reach out to the groups who, under standard circumstances, are likely to be insufficiently represented at community gatherings.

4.2.3 Description of Engagement Methods

Various methods of engagement will be used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultation, decision-making and the development of impact management solutions. International standards increasingly emphasize the importance of a consultation being 'free, prior and informed', which implies an accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information. To fulfil this requirement, a range of consultation methods are applied that specifically focus on this approach. Information that is communicated in advance of public consultations primarily includes:

- An announcement thereof in the public media – communities, county and national, as well as the distribution of invitations and full details of the forthcoming meeting well in advance, including the agenda. It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the target community.
- These parameters can be achieved by implementing the following approach:
 - Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication, i.e. it should be made available via publicly accessible locations and channels.
 - The primary means of notification may include mass media and the dissemination of posters/ advertisements in public places.
 - The project keeps proof of the publication (e.g. a copy of the newspaper announcement) for the accountability and reporting purposes.
 - Existing notice boards in the communities may be particularly useful for distributing the announcements, such as on boards adjacent to the widely visited public premises (chain stores, transport links, and offices of the local NGOs).
 - When the notifications are placed on public boards in open air, it should be remembered that the posters are exposed to weather, may be removed by-passers, or covered by other advertisements.
 - The project's staff will therefore maintain regular checks to ensure that the notifications provided on the public boards remain in place and legible.

4.2.4 Adaptation to COVID-19

In light of the outbreak of COVID-19, individuals are mandated by national directives to exercise social distancing and avoid public gatherings to prevent and reduce the risk of the virus transmission. Meanwhile, WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) RCCE readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. These can be accessed at: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>. See Annex 1 for COVID-19 health and safety guidelines.

Aforementioned considerations require a review of existing approaches to stakeholder engagement and consultations. These are premised on:

- Identifying planned activities requiring stakeholder engagement and public consultations, and for which any postponement may hinder project performance.
- Assessing the level of required direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders.
- Evaluating the risks of the virus transmission for and the effect of ongoing restrictions on these engagements.
- Investigating the level of ICT penetration among key stakeholder groups, if feasible, identifying the type of communication channels that can be effectively used in the project context.

In the event where public gatherings with a representative sample of project beneficiaries, affected peoples and other interested parties are not feasible, the project may elect a community representative based on inputs provided by beneficiaries. A network of such representatives can be established across the target communities to determine feasible methods of wider community outreach and consultation with stakeholders. Alternate forms of messaging would be explored, and contingency plans instituted to tailor engagement when the intended tools cannot be deployed. Some of these include:

- All public gatherings, hearings, workshops and community meetings shall be avoided until deemed safe in line with national and international advisories.
- However, small-scale focus group discussions may be arranged if permitted, with guidance around social distancing and other precautions closely adhered to.
- If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype.
- Online channels, social media platforms and chatgroups will be dedicated and deployed subject to ability of all stakeholders to equitably participate in consultations.
- Traditional channels, notably television and radio broadcasting, dedicated phone-lines and mail will also be leveraged to raise awareness of project activities amongst all user groups as needed.
- Each of the proposed channels of engagement should specific mechanisms to solicit feedback from relevant stakeholders.
- In which case direct communication with certain affected peoples are of the essence, channels for engagement, employing a context-specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators, will be designed based on preference expressed by said beneficiaries.
- Everyone involved in stakeholder planning will be trained in positive social behavior and hygiene practices and are required to preface every engagement session by articulating them.

Table 4: Methods for Stakeholder Engagement

Engagement Technique	Description and use	Target audience	Timeframe
Websites	The Project PAD and SEP will be published on official websites of IAs (MYS and LACE) and the World Bank.	All stakeholders	Before Project Appraisal

Media announcements	Advance announcements of commencement of major project activities, project Grievance Redress Mechanism, and other outreach needs of the project.	Project-affected stakeholders and communities	Throughout project implementation
Information Boards of key implementing agencies at all levels	Advance announcement of commencement and progress for major project activities.	Project-affected communities	Continuous
Community / public meetings	These interactive platforms will be used to convey general information on the Project, detailed discussions on sub-project activity that is planned by the project, project environmental and social risks and mitigation measures and to provide regular updates on implementation progress to local, county and national stakeholders.	Project-affected communities	On a quarterly basis
Correspondence by phone/ email/written letters	Distribute project information to government officials, organizations, agencies, and companies and invite stakeholders to meetings.	Government officials, NGOs, CSOs, CBOs, trade associations, Development Partners	On a quarterly basis
Printed media advertisement	This will be used to disseminate and disclose project documents intended for general readers and audience, Advertise project procurements, as applicable.	General public	Bi-annually or more as required
Distribution of printed public materials: Project information leaflets, brochures, fact sheets	This will be used to convey general information on the Project and to provide regular updates on its progress to local, county, and national stakeholders.	General public and project beneficiary	Bi-annually
Internet/Digital Media	Use of the official websites of IAs (MYS and LACE) to promote various information and updates on the overall project, impact assessment and impact management process, procurement, employment opportunities, as well as on project's engagement activities with the public.	Project stakeholders and other interested parties that have access to the internet resources.	All the time
One-on-one interviews	This will be used to solicit views and opinions on project impacts, challenges, and solutions.	Vulnerable individuals, CSOs, NGOs, business associations, job seekers, DPs, etc.	By the end of the budget year

Dedicated hotline and short code	A designated and manned telephone line will be set up that can be used by the public to make complaints and grievances, obtain information, make enquiries, or provide feedback on the project.	Project affected persons, and any other stakeholders and interested parties	To be started within six months of project effectiveness and will continue throughout project implementation
Workshops	This channel will be used to: (i) Present project information to a group of stakeholders; (ii) Allow the group of stakeholders to provide their views and opinions; (iii) Use participatory exercises to facilitate group discussions, brainstorm issues, analyze information, and develop recommendations and strategies; and (iv) Recording of responses.	Government, NGOs, CSOs, DPs, Private Sector Associations	On a quarterly basis
Focus group meetings	This will be used to facilitate discussion on specific issues such as GBV, disability inclusion, etc. that merit collective examination with various groups of stakeholders using FGDs.	Vulnerable groups	During preparation and bi-annually during implementation.
Surveys and Independent evaluations	Surveys will be used to gather beneficiary opinions and views about project interventions. CSOs could also be engaged to support citizen feedback surveys for the project.	Project beneficiaries	Annually

Table 5: Summary of information disclosure at different stages of the project

Project stage	List of information to be disclosed	Methods proposed	Tentative Timetable: Locations/ dates	Target stakeholders	% reached	Responsibilities
Project Preparation	Project Design summary, SEP, ESCP, Grievance Redress Mechanism setup	Community Meetings, Focus group Events, and Special Gatherings	Project preparation period at selected community venues	Community members in Targeted project areas	About 40% percent of target audience	Project Preparation team in collaboration with concerned offices
		Community, Cities and National Radio stations	After Bank Approval	Community members in Targeted project areas	60% of target audience	Project preparation team and IAs and offices
		Make available printed and electronic copies at National, County/City and Communities level, Disclose ESCP and GRM on websites	After Bank Approval	National and City level stakeholders	95% of target core stakeholders	PMT and IAs (MYS/LACE)
	ESMF and RPF	Project website or Executive Mansion website, hard copies to be available in project for review	ESMF and RPF to disclosed before project appraisal	Project beneficiaries and all interested stakeholders	-	PMT and IAs (MYS/LACE)

	LMP, SEP, and GBV Action Plan	Project website or Executive Mansion website, hard copies to be available in project for review	LMP and SEP to be disclosed before project appraisal GBV Action Plan to be disclosed before implementing project activities	Project beneficiaries and all interested stakeholders	-	PMT and IAs (MYS/LACE)
Project implementation	Project Progress Reports	Review Meetings, A short summary of annual report in simple and accessible language to local communities and media Focus group feedback sessions with most vulnerable Interviews and one on one meetings	Annually throughout the project life span	Stakeholder representative at national, city and community level	100% of target stakeholders	PMT and IAs (MYS/LACE).
	ESMP and RAP	Stakeholder consultation required during preparation of ESMP and RAP. This will require focus group discussion, community meetings, and key informant interview		Project beneficiaries, affected communities and people and all interested stakeholders	-	PMT and IAs (MYS/LACE).
	Other E&S related information including OHS, community health and safety, traffic management	Focus group sessions, Interviews, community meetings, and awareness on local and radio stations	Regularly throughout project implementation	Community members in Targeted project areas	-	PMT and IAs (MYS/LACE), Contractors

4.3 Proposed Strategy for Consultation

Stakeholder engagement and consultation commenced since the inception of the project design. Community engagement for the project should adapt different methods depending on roles and interests of stakeholders and beneficiaries. Furthermore, effective, and inclusive engagement will require the consideration of methods of engagement with the vulnerable beneficiary groups including youth and children.

The project shall employ open community meetings, focus group discussions, interviews, and workshops as a means of carrying out consultations. These shall be done in the target county/city and communities with special consideration to enable easy participation of vulnerable and disadvantaged groups of people.

Key points from the quarterly consultation forums will be summarized and shared with stakeholders. The implementing agencies (MYS and LACE) will be responsible for ensuring the feedbacks and recommendations inform the project design and implementation and are incorporated in project progress reports.

Table 6: Summary of key consultations and methods to be employed

Project stage	Topic of consultation	Method used	Timetable: Location and dates (TBA)	Target stakeholders	Responsibilities
Project Preparation	Project design elements	Workshop with Target stakeholders	Quarterly	Government Ministries and agencies, Project IAs, development partners and NGOs	MYS, LACE, MPW, MCI, MoH, MOL, Project Preparation Team and the WB
	Project design, Environmental and Social Risks, Mitigation Measures, GRM and SEP	Meetings with county Offices and City/district Level Project IAs/Units	Quarterly	County level and City/Districts Level Project IAs/Units, Environmental and Social Safeguard Focal Persons	Project Preparation Team and EPA in collaboration with Social and environmental risk management Task team
	Project design, Environmental and Social Risks, Mitigation Measures, GRM and SEP	Community Meetings focus group discussions and interviews	Quarterly	Representative Members of Selected Communities, Elders, disabled and Women Group, target beneficiaries, religious leaders and political leaders, and traditional and social organizations	Project Preparation Team and EPA, and MGCSP in collaboration with Social and environmental risk management Task team
Project Implementation	Project implementation Progress Review meetings	Community Meetings, physical information	Quarterly	Representative Members of Selected Communities, Elders, disabled and Women Group, participating beneficiaries, religious and political leaders, traditional and CBOs, formal financial institutions/mobile money operators who will be involved in delivering payments to all beneficiaries	City/district, community Level, Project Implementation Units, MFDP and project focal persons with city/community level stakeholders and financial institutions/mobile money operators for payment delivery to all beneficiaries
Project phase out	Exit strategy preparation	Community Meetings	Final year of the project	Representative Members of Selected Communities, Elders, disabled and Women Group, beneficiaries, religious leaders, political leaders.	County City/district level with support of Aid Management Unit.

4.4 Proposed Strategy to Incorporate Views/Opinions of Disadvantaged and Vulnerable Groups

Appropriate and clear methods of communication shall be used to inform participants about the consultation meetings. This will include invitation letters and direct contact by service provider staffs stipulating the types and number of community stakeholder groups expected to come to the meetings. Adequate consideration should be given to organize meetings within manageable distances for people with walking or physical challenges due old age or for individuals who might require use of megaphones and interpreters (sign language) due to hearing challenges. An extra effort shall also be undertaken to reach out to nonbeneficiary members of the target communities to make them understand the project targeting processes and capacity limits so that they do not feel disadvantaged. The project may need to go further to meet people with disability on one-on-one basis as needed to ensure that their views and concerns are heard. Moreover, the project will ensure that all consultations are culturally appropriate.

The community meetings shall be properly facilitated using a pre-designed discussion guide that will carry specific questions targeting vulnerable groups. Service provider staffs at all levels shall be used to lead and conduct community meetings to ensure equitable participation and contribution of marginalized groups. The facilitating teams shall have skilled note takers who will video record the deliberations verbatim with the aid of voice recorders. In cases where necessary, one on one interviews and surveys will be used to ensure the inclusion of views and concerns of vulnerable beneficiaries.

Focus groups and/or workshops and meetings with young people (ages 18-35) will be facilitated with experienced facilitators in youth participatory methods. Sign language and visual techniques and personal aids will be made available where persons with disability or visually impaired are consulted. Arrangements will need to be made for childcare or elderly care and all costs necessary should be incorporated in budgets.

Verbal consent shall be sought from meeting participants before video or audio recorders are used in recording of the proceedings. Comment/suggestion boxes shall also be prepared and placed in designated places within close reach of the communities to enable them to submit their views and reactions after information disclosure meetings. After completion of consultations, the field notes, transcriptions and key issues shall be consolidated, analyzed and incorporated into the relevant project documents by service provider staffs and PMT.

All views expressed by stakeholders will be carefully noted, documented in the consultation summary, and considered, including those of disadvantaged or vulnerable groups. The following strategy will be used for consultation with vulnerable groups:

- Issuance of invitations specific to the relevant groups: women groups, people with disabilities, poor and other vulnerable groups.
- Conduct specific consultations with each of these groups separately in a location and venue easily accessible to them. Women's association, Youth association, elderly group and association for people with disabilities will be used, involved reaching these groups.
- Consultation with vulnerable people will be conducted throughout the project life. There will be separate FGDs arranged with vulnerable people during project design/preparation stage on a quarterly basis. The key focus will be to explore problems and needs of these groups and how to reach them. There will also be quarterly meetings conducted with these groups during project implementation.

4.5 Review of Comments

Upon disclosure of project information, provision will be made for websites of IAs where dedicated space in their portal will be provided for the public and concerned stakeholders to submit their comments, observations, and questions regarding the project. For information disclosed through meetings, instant feedback will be collected through designated rapporteurs/data clerk who will be available during the meetings. Participating stakeholders shall also be given freedom to take their own minutes of the proceedings and share a copy with the rapporteurs.

After the deadline for submission is passed comment/suggestion boxes will be collected from the sites for consolidation, analysis, and inclusion into the project documents. A summary of how comments were considered will be made and shared with the stakeholders through project implementation inception meetings once concerned authorities make the final decision on the project.

5. Grievance Mechanism (GM)

REALISE is a multifaceted project having multiple interventions that are mostly expected to have positive impacts in addressing urban poverty and unemployment in the target communities and the country at large. While considerable efforts have been made to include social and environmental risk management in the design and implementation of the project in order to minimize and prevent potential adverse impacts, there is always a possibility that interests of some individuals, groups and institutions may still be negatively affected by the activities of the project.

Typical grievances that are anticipated from the implementation of REALISE project subprojects include claims and complaints about targeting/recruitment and selection of project beneficiaries (inclusion, exclusion), lack of transparency in payment of grants and labor subsidies, poor service delivery including delays, unfair treatment by service provider/project staff and discrimination based on sex or other physical and health conditions. Restrictions on land use, loss of property, disruption of access paths, corrupt practices, human rights violations, child labor, and gender-based violence (GBV) and sexual exploitation and abuse (SEA) are among the potential grievances that may arise during implementation of subprojects.

Such instances may generate complaints from individuals, groups and institutions that may be affected. Therefore, a well-defined, clear and transparent system for receiving, recording and resolving potential concerns and complaints that may arise from project-affected persons is an essential and necessary mechanism to provide remedies to grievances early enough to avoid unnecessary project implementation delays and obstructions.

In this regard, REALISE will build on the Grievance Redress Mechanism (GRM) that was established under YOP to improve service delivery to beneficiaries and stakeholders. The project will rely on existing structures and procedures at the community, county, and national levels. REALISE will build on the procedures and structures developed under YOP to gather and respond to feedback/complaints from parties affected by project implementation.

5.1 Categories of Potential Complaints and Grievances

Given the activities of REALISE outlined above, it is anticipated complaints and grievances that may arise related to implementation of the project will fall under four broad categories as specified below:

- I. **Administrative:** this category of complaints relates to procedural and implementation complaints/grievances that may arise during the project implementation. It also includes the conduct and behavior of PMT staff and service providers, e.g.:
 - Actions or inactions of PIU staff and service providers that are deemed to cause harm to beneficiaries and project affected people.
 - Procedural missteps resulting from the process of selecting and recruiting beneficiaries into the project.
 - Complaints around business grants and wages disbursement mechanisms.
 - Complaints by potential beneficiaries who feel unfairly treated.

- II. **Social Jealousy and Related Issues**
 - Complaints about conduct of project beneficiaries.
 - Complaints about misapplication of project benefits.
 - Exclusion from participation in the project.

- III. **Alleged Corruption and Rent-Seeking:** this category may involve complaints around the following which may occur at the National, County, or Community level:
 - Request for bribes or taxes from beneficiaries by project staff, service provider or persons directly or indirectly connected to the project.
 - Theft or misappropriation of project resources.

- IV. **Sexual and Gender-Based Violence (SGBV):** This category will involve complaints around unfair treatment by service provider/project staff or discrimination based on gender or sexual orientation. The following examples apply:
 - Being asked to perform sexual favors in order to benefit from the project.
 - Being excluded from certain benefits/activities of the project owing to gender/gender orientation.
 - Cause to suffer physical or emotional injury owing to gender.

The project will ensure to use referral pathways to other national grievance redress mechanisms for complaints outside the jurisdiction of implementing agencies such as rape, physical assault, severe injury and death.

5.2 GRM Standards and Principles

The grievance redress mechanism of the project is designed to reflect (i) the Laws of Liberia, and (ii) the World Bank's relevant policies on social safeguards and is built around the following principles:

- Commitment to fairness in both process and outcomes.
- Protection against reprisal for all complainants and aggrieved parties.
- Dedication to building broad internal support for the grievance mechanism across project lines.
- Commitment to being responsive, respectful, and sensitive to local culture and norms.
- Mainstreaming responsibility for addressing grievances throughout the project, rather than isolating it.
- Willingness by senior project management to visibly and sincerely champion the grievance system.

Grievance Redress Committees (GRC), which were established at project communities, and district levels under YOP will be reorganized and adequately capacitated to support REALISE. Additionally, the GRM will be extended to the national level through a Project National Grievance Committee to be headed by the

Hon. Minister of Youth and Sports and with membership from the Project Steering Committee, which shall be the highest level for handling all types of grievances arising from implementation of the project.

The GRM will have dedicated focal persons at county, community, and national level responsible for grievances coming from different components of project implementation and will utilize existing toll free GRM phone short code (3344) and Management Information System (MIS) GRM module established under YOP for receiving, recording and responding to grievances. The GRM channels will be promoted as much as possible as part of a communication campaign and trainings so beneficiaries of the project are aware of channels through which they could voice their grievances and complaints.

Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers

In the case of LIPW beneficiaries, the community level GRM will be the first opportunity for resolution of grievances through discussion and mutual agreement between the project-affected person and members of GRCs. Community level GRC will facilitate receiving, recording and resolution of grievances at their project site through a designated member (focal person) of the committee. The LIPW beneficiaries will be sensitized to put forward their grievances or concerns about anyone or anything related to the project through appropriate channels of their choice which will include:

- Face-to-face meetings with GRC members, PMT staff during visits to their project site
- Grievance/suggestions boxes and desks
- Written letters, e-mail/website (TBD) or SMS/hotline (3344) services.

Upon receipt of the grievance, the GRC shall assess the grievance to establish whether it could be resolved locally or needs to be referred to the next level. Where possible, the GRC shall attempt to resolve and close the matter if the complainant is satisfied with the resolution. Where the matter has failed to be resolved or where it is deemed to be beyond the capacity of the GRC, the matter shall be referred to the national level GRM Committee or another relevant institution for further redress. The complainant will be informed, and the determination will be appropriately recorded in a grievance register, as part of the project's MIS. Upon receiving a written referral from the community GRM, the GRC shall also attempt to resolve the matter by convening concerned parties where possible. The same process will be repeated with further referral levels until the case is resolved.

Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses

Given that the project involves different actors, including small business owners, service providers and government institutions, there is a wide range of scope for grievances to occur throughout the project cycle. Small business owners could hold grievances and voice complaints at different stages of the project cycle, including at selection.

At the national level, the PMT will establish a system for the receipt, recording and referral of complaints and grievances. This will include a dedicated SMS complaints number, an online platform, and a toll-free line (3344) through which beneficiaries and firms may lodge complaints. The PMT will dedicate a GRM officer to manage the receipt, recording and referral of complaints and grievances. The officer may refer the complaints to the service providers or to PMT.

For cases that have been referred previously but have not been resolved, the officer may escalate these directly to the County Steering Committee (CSC) for review and resolution. The CSC will have, among others, a private sector representative. Through this representation, general cases of complaints and

feedback from existing private sector associations may be brought directly to the CSC for discussion and resolution.

At the local level, the community GRCs will be the human entry point for all grievances and complaints. A committee at local level Community Oversight Committee (COC) meets once a week to discuss and review complaints. If it is an administration or policy related complaint, it is referred to CSC.

This process is overseen and guided by the GRM Officer. The officer will oversee training, information, and supervision to make sure the focal persons and the GRM committee are capacitated to receive, review and process complaints. In addition, when complaints are referred to the County, CSC will provide a solution if possible. If this is not possible, the CSC will forward the complaint to the PMT.

The GRM at the national, county, and community levels, the system that will be used for the receipt, recording and referral of complaints and grievances need to be integrated with the MIS. Complaints received directly through the toll-free line (TBD) will be provided for the beneficiary to forward their issues. Moreover, a member of GRM at community level will collect all type of grievances from component III beneficiaries. SMS or online mechanisms will be recorded directly into national level MIS and referred for resolution by the relevant offices.

6. Monitoring and Reporting Plan

The REALISE project shall use a comprehensive and systematic M&E system to effectively monitor the implementation of the SEP and measure the impacts under each component. It shall be undertaken alongside with other monitoring and evaluation exercises of the project implementation using copies of registry that the GRCs at each level keeps and maintains. This approach will assist to establish the levels of effective functionality of established SEP grievance handling procedures and identify areas for future improvements to achieve optimum efficiency of the GRM system.

6.1 Monitoring Plan

The SEP monitoring process shall be done by both the community and the national/county level, REALISE Project preparation team and CSC. At the National level, the M&E Officer in the PMT will be in-charge of SEP implementation monitoring. He/she will provide technical support and training to the CSC focal persons, and at the community level COC focal persons. The M&E Officer will be responsible for reporting and implementing SEP.

6.2 Key Performance Monitoring Indicators

Key Citizen Engagement performance indicators to be periodically collected, reported, and analyzed includes

- Number of citizens provided information about the REALISE project
- Number of women participated in formal or public meetings
- Citizen knowledge about project service (availability, eligibility, and transparency)
- Number of active project complaints and appeals
- Number and type of formal and informal complaints and suggestions received
- Percentage of grievance redressed claims settled within three months of application
- Percentage of unresolved complaints or disputes during the monitoring period

- Comments received by government authorities, women & youth, family, community leaders and other parties and passed to the Project.

7. Resources and Responsibilities for implementing stakeholder engagement activities

The project Coordinator will be responsible for the overall implementation of the SEP. Other key staff, including the Social Safeguard Officer and the Environmental Officer, will play important roles in implementing the SEP. The SEP activities will be included in project annual work plan & budget to ensure that they are properly budgeted for and implemented as planned.

7.1 Resources

Table 7 provides itemized provisional budget estimates for implementation of SEP and GRM operating cost. An estimated amount of US\$79,000 (Seventy-nine thousand US Dollars) will be required for SEP implementation and GRM operating costs. This will be revised when the SEP is updated during project implementation.

Table 7: Budget estimate for SEP implementation

Project Stage/Activities	Responsible	Estimated Cost per Year and frequency	Estimated projected Cost (3yr) in US\$
Project Design Level			
Draft of SEP, LMP, ESCP, ESMF	Environmental and Social Safeguard Officer, MYS/LACE assisted by external consultant		\$ 10,000.00
Implementation			
Public consultation during RPF and ESMF preparation	Environmental Officer and Social Safeguard Officer, MYS/LACE	\$ 2,000	\$ 6,000
Field Visit (fuel, communication cards, DSA) per quarter.	Environmental Officer and Social Safeguard Officer, MYS/LACE	10,000.00 per yr. (4 field trips/yr.)	\$ 30,000.00
Community discussion, Town hall meetings, workshops & announcements (quarterly basis)	Environmental Officer and Social Safeguard Officer, Project Coordinator, MYS/LACE	2,000.00 per/yr. (At least a stakeholder engagement activity every 3 months)	\$ 6,000.00
Radio broadcast	Communication Department (MYS/LACE)	Lumpsum	\$ 5,000.00
Direct Communication, scratch cards, Internet throughout the duration of the project	Environmental Officer and Social Safeguard Officer, PMT, MoH	Lumpsum	\$ 10,000.00

Project Stage/Activities	Responsible	Estimated Cost per Year and frequency	Estimated projected Cost (3yr) in US\$
Newspaper ads, TV shows	Environmental Officer and Social Safeguard Officer, PMT, MYS/LACE	Lumpsum	\$ 2,000.00
GRM Implementation (throughout the duration of the project)	Environmental Officer and Social Safeguard Officer (Responsible for GRM), PMT, MYS/LACE	Lumpsum	\$ 10,000.00
Total Budget			\$ 79,000

7.2 Management functions and responsibilities

The PMT will be responsible for the implementation of activities listed in the SEP. These activities will be incorporated in the overall project implementation plan and resources allocated accordingly. Several key staff of the PMT will have various responsibilities. For instance, dissemination of key information about the project during project launching and implementation will be carried out by the project Coordinator, the Communication Officers of IAs, other staff that may be responsible specific project component. Other activities such as consultation during ESMP preparation will be carried out by E&S consultants and project E&S staff including the Social Safeguard Officer and the Environmental Officer.

Progress on stakeholder engagement activities will be tracked in monthly and quarterly project reports. The monthly and quarterly stocktaking of stakeholder engagement activities is intended to inform management about the status of planned activities against what have been undertaken. The biannual Progress Report mandated by the ESCP will also include update on the implementation of stakeholder engagement activities.

The World Bank Task Team for the Project provides oversight on these and may request any of the monthly and quarterly reports as needed. The Bank Team will ensure that these activities are covered in the project annual work plan and procurement plan.

Contact information of key staff in charge of the SEP:

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GENERAL GUIDELINES ON COVID-19 CONSIDERATIONS FOR SAFETY AT PROJECT SITES¹

Addressing COVID-19 at a project site goes beyond occupational health and safety and is a broader project issue which will require the involvement of different members of a Project Management Team (PMT). In many cases, the most effective approach will be to establish procedures to address the issues, and then to ensure that these procedures are implemented systematically. Where appropriate given the project context, a designated team should be established to address COVID-19 issues, including PMT representatives, the Supervising Technical Staff, management (e.g. the project manager) of the contractor and sub-contractors, security, and medical and OHS professionals. Procedures should be clear and straightforward, improved as necessary, and supervised and monitored by the COVID-19 focal point(s). Procedures should be documented, distributed to all contractors, and discussed at regular meetings to facilitate adaptive management. The issues set out below include a number that represent expected good workplace management but are especially pertinent in preparing the project response to COVID-19.

(a) ASSESSING WORKFORCE CHARACTERISTICS

Many project sites will have a mix of workers e.g. workers from the local communities where project activities are being implemented; workers from a different part of the country; workers from another country. Workers will be employed under different terms and conditions and be accommodated in different ways. Assessing these different aspects of the workforce will help in identifying appropriate mitigation measures:

- The service provider/supervising staff should prepare a detailed profile of the project work force, key work activities, schedule for carrying out such activities, different durations of contract and rotations (e.g. 4 weeks on, 4 weeks off).
- This should include a breakdown of workers who reside at home (i.e. workers from the community), and workers who come from out of the local community. Where possible, it should also identify workers that may be more at risk from COVID-19, those with underlying health issues or who may be otherwise at risk.
- Consideration should be given to ways in which to minimize movement to and from subproject site.
- Because workers from local the communities will be returning home daily from subproject sites, it will be more difficult to manage them. As much as possible, they should be subject to health upon arrival at the site (as set out above) and be required to seek immediate medical help where signs and symptoms of COVID are detected.

(b) ENTRY/EXIT TO THE WORK SITE AND CHECKS ON COMMENCEMENT OF WORK

Entry/exit to the work site should be controlled and documented for both workers and other parties, including support staff and suppliers. Possible measures may include:

- Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.

¹ Adapted from general guidance provided from the World Bank for worksites.

- Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviors required of them in enforcing such system and any COVID - 19 specific considerations.
- Training staff who will be monitoring entry to the site, providing them with the resources they need to document entry of workers, conducting temperature checks and recording details of any worker that is denied entry.
- Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
- Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site.
- Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
- During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
- Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.
- Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.

(c) GENERAL HYGIENE

Requirements on general hygiene should be communicated and monitored, to include:

- Training workers and staff on site on the signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular hand washing and social distancing) and what to do if they or other people have symptoms (for further information see [WHO COVID-19 advice for the public](#)).
- Placing posters and signs around the site, with images and text in local languages.
- Ensuring hand washing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout site, including at entrances/exits to work areas; where there is a toilet, canteen or food distribution, or provision of drinking water; in worker accommodation; at waste stations; at stores; and in common spaces. Where hand washing facilities do not exist or are not adequate, arrangements should be made to set them up. Alcohol based sanitizer (if available, 60-95% alcohol) can also be used.
- Review worker accommodations, and assess them in light of the requirements set out in [IFC/EBRD guidance on Workers' Accommodation: processes and standards](#), which provides valuable guidance as to good practice for accommodation.
- Setting aside part of worker accommodation for precautionary self-quarantine as well as more formal isolation of staff who may be infected.

(d) CLEANING AND WASTE DISPOSAL

Conduct regular and thorough cleaning of all site facilities, including offices, and common spaces. Review cleaning protocols for key work

equipment (particularly if it is being operated by different workers). This should include:

- Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.

- Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.
- Where it is anticipated that cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, providing them with appropriate PPE: gowns or aprons, gloves, eye protection (masks, goggles or face screens) and boots or closed work shoes. If appropriate PPE is not available, cleaners should be provided with best available alternatives.
- Training cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).
- Any medical waste produced during the care of ill workers should be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO). If open burning and incineration of medical wastes is necessary, this should be for as limited a duration as possible. Waste should be reduced and segregated, so that only the smallest amount of waste is incinerated (for further information [see WHO interim guidance on water, sanitation and waste management for COVID-19](#)).

(e) ADJUSTING WORK PRACTICES

Consider changes to work processes and timings to reduce or minimize contact between workers, recognizing that this is likely to impact the project schedule. Such measures could include:

- Decreasing the size of work teams.
- Limiting the number of workers on site at any one time.
- Changing to a 24-hour work rotation.
- Adapting or redesigning work processes for specific work activities and tasks to enable social distancing, and training workers on these processes.
- Continuing with the usual safety trainings, adding COVID-19 specific considerations. Training should include proper use of normal PPE. While as of the date of this note, general advice is that work workers do not require COVID-19 specific PPE, this should be kept under review (for further information see [WHO interim guidance on rational use of personal protective equipment \(PPE\) for COVID-19](#)).
- Reviewing work methods to reduce use of work PPE, in case supplies become scarce or the PPE is needed for medical workers or cleaners. This could include, e.g. trying to reduce the need for dust masks by checking that water sprinkling systems are in good working order and are maintained or reducing the speed limit for haul trucks.
- Arranging (where possible) for work breaks to be taken in outdoor areas within the site.
- Consider changing canteen layouts and phasing meal times to allow for social distancing and phasing access to and/or temporarily restricting access to leisure facilities that may exist on site, including gyms.
- At some point, it may be necessary to review the overall project schedule, to assess the extent to which it needs to be adjusted (or work stopped completely) to reflect prudent work practices, potential exposure of both workers and the community and availability of supplies, taking into account Government advice and instructions.

(f) LOCAL MEDICAL AND OTHER SERVICES

Given the limited scope of project medical services, the project may need to refer sick workers to local medical services. Preparation for this includes:

- Obtaining information as to the resources and capacity of local medical services (e.g. number of beds, availability of trained staff and essential supplies).
- Conducting preliminary discussions with specific medical facilities, to agree what should be done in the event of ill workers needing to be referred.
- Considering ways in which the project may be able to support local medical services in preparing for members of the community becoming ill, recognizing that the elderly or those with pre-existing medical conditions require additional support to access appropriate treatment if they become ill.
- Clarifying the way in which an ill worker will be transported to the medical facility, and checking availability of such transportation.
- Establishing an agreed protocol for communications with local emergency/medical services.
- Agreeing with the local medical services/specific medical facilities the scope of services to be provided, the procedure for in-take of patients and (where relevant) any costs or payments that may be involved.
- A procedure should also be prepared so that project management knows what to do in the unfortunate event that a worker ill with COVID-19 dies. While normal project procedures will continue to apply, COVID-19 may raise other issues because of the infectious nature of the disease. The project should liaise with the relevant local authorities to coordinate what should be done, including any reporting or other requirements under national law.

(g) INSTANCES OR SPREAD OF THE VIRUS

WHO provides detailed advice on what should be done to treat a person who becomes sick or displays symptoms that could be associated with the COVID-19 virus (for further information see [WHO interim guidance on infection prevention and control during health care when novel coronavirus \(nCoV\) infection is suspected](#)). The project should set out risk-based procedures to be followed, with differentiated approaches based on case severity (mild, moderate, severe, critical) and risk factors (such as age, hypertension, diabetes). These may include the following:

- If a worker has symptoms of COVID-19 (e.g. fever, dry cough, fatigue) the worker should be removed immediately from work activities and isolated on site.
- If testing is available on site, the worker should be tested on site. If a test is not available at site, the worker should be transported to the local health facilities to be tested (if testing is available).
- If the test is positive for COVID-19 or no testing is available, the worker should continue to be isolated. This will either be at the work site or at home. If at home, the worker should be transported to their home in transportation provided by the project.
- Extensive cleaning procedures with high-alcohol content disinfectant should be undertaken in the area where the worker was present, prior to any further work being undertaken in that area. Tools used by the worker should be cleaned using disinfectant and PPE disposed of.
- Co-workers (i.e. workers with whom the sick worker was in close contact) should be required to stop work, and be required to quarantine themselves for 14 days, even if they have no symptoms.
- Family and other close contacts of the worker should be required to quarantine themselves for 14 days, even if they have no symptoms.
- If a case of COVID-19 is confirmed in a worker on the site, visitors should be restricted from entering the site and worker groups should be isolated from each other as much as possible.
- If workers live at home and has a family member who has a confirmed or suspected case of COVID-19, the worker should quarantine themselves and not be allowed on the project site for 14 days, even if they have no symptoms.
- Workers should continue to be paid throughout periods of illness, isolation or quarantine, or if they are required to stop work, in accordance with national law.

- Medical care (whether on site or in a local hospital or clinic) required by a worker should be paid for by the employer.

(h) CONTINUITY OF SUPPLIES AND PROJECT ACTIVITIES

Where COVID-19 occurs, either in the project site or the community, access to the project site may be restricted, and movement of supplies may be affected.

- Identify back-up individuals, in case key people within the project management team (PMT, Supervising Technical Staff, Contractor, sub-contractors) become ill, and communicate who these are so that people are aware of the arrangements that have been put in place.
- Document procedures, so that people know what they are, and are not reliant on one person's knowledge.
- Understand the supply chain for necessary supplies of energy, water, food, medical supplies and cleaning equipment, consider how it could be impacted, and what alternatives are available. Early pro-active review of international, regional and national supply chains, especially for those supplies that are critical for the project, is important (e.g. fuel, food, medical, cleaning and other essential supplies). Planning for a 1-2-month interruption of critical goods may be appropriate for projects in more remote areas.
- Place orders for/procure critical supplies. If not available, consider alternatives (where feasible).
- Consider existing security arrangements, and whether these will be adequate in the event of interruption to normal project operations.
- Consider at what point it may become necessary for the project to significantly reduce activities or to stop work completely, and what should be done to prepare for this, and to re-start work when it becomes possible or feasible.

(i) TRAINING AND COMMUNICATION WITH WORKERS

Workers need to be provided with regular opportunities to understand their situation, and how they can best protect themselves, their families and the community. They should be made aware of the procedures that have been put in place by the project, and their own responsibilities in implementing them.

- It is important to be aware that in communities close to the site and amongst workers without access to project management, social media is likely to be a major source of information. This raises the importance of regular information and engagement with workers that emphasizes what management is doing to deal with the risks of COVID-19. Allaying fear is an important aspect of work force peace of mind and business continuity. Workers should be given an opportunity to ask questions, express their concerns, and make suggestions.
- Training of workers should be conducted regularly, as discussed in the sections above, providing workers with a clear understanding of how they are expected to behave and carry out their work duties.
- Training should address issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work.
- Training should cover all issues that would normally be required on the work site, including use of safety procedures, use of work PPE, occupational health and safety issues, and code of conduct, taking into account that work practices may have been adjusted.

- Communications should be clear, based on fact and designed to be easily understood by workers, for example by displaying posters on handwashing and social distancing, and what to do if a worker displays symptoms.

(j) COMMUNICATION AND CONTACT WITH THE COMMUNITY

Relations with the community should be carefully managed, with a focus on measures that are being implemented to safeguard both workers and the community. The community may be concerned about the presence of non-local workers, or the risks posed to the community by local workers presence on the project site. The following good practice should be considered:

- Communications should be clear, regular, based on fact and designed to be easily understood by community members.
- Communications should utilize available means. In most cases, face-to-face meetings with the community or community representatives will not be possible. Other forms of communication should be used; posters, pamphlets, radio, text message, electronic meetings. The means used should take into account the ability of different members of the community to access them, to make sure that communication reaches these groups.
- The community should be made aware of procedures put in place at site to address issues related to COVID-19. This should include all measures being implemented to limit or prohibit contact between workers and the community. These need to be communicated clearly, as some measures will have financial implications for the community (e.g. if workers are paying for lodging or using local facilities). The community should be made aware of the procedure for entry/exit to the site, the training being given to workers and the procedure that will be followed by the project if a worker becomes sick.
- If project representatives, contractors or workers are interacting with the community, they should practice social distancing and follow other COVID-19 guidance issued by relevant authorities, both national and international (e.g. WHO).