1. Introduction

The novel coronavirus disease (COVID-19) has been spreading rapidly across the world since December 2019, following the initial cases in Wuhan, Hubei Province, China. Whilst the pandemic imposed tremendous strain on the health systems as they try to cope with the increase demand for services, it has also resulted in tremendous economic and social hardship as governments institute measures such as ‘social distancing’ to limit the spread of the disease. One of the consequences of these measures was the closure of schools.

UNESCO reports schools in 188 countries have closed—many for the remainder of the academic year—affecting 89.5 percent of all learners or 1.5 billion persons worldwide.2 Immediate action is required to ensure continuity of learning during the crisis, and to prepare school systems to reopen once the pandemic subsides. This is particularly critical in the Bank’s least developed client countries.

On March 31, 2020, the Global Partnership for Education (GPE) Board voted to create a US$250.0 million COVID-19 Accelerated Funding Window under the GPE Fund. This window will provide allocations to address the pandemic’s impact on education systems in 67 countries.

In The Gambia, the first cases of COVID-19 were reported in March 2020, and following a presidential address on March 17, 2020, The Gambia closed all schools and education institutions as a measure to protect children and communities to control the spread of the virus. The school closure directly affects at least 674,300 children from early childhood to senior secondary school. The initial closure was for 21 days, and an extension of the school closure is ongoing and could possibly last at least through the beginning of the next academic year. Immediate action is required to ensure continuity of learning during the crisis, and to prepare school systems to reopen once the pandemic subsides. Currently, the Ministry is collaborating with the media houses for lessons delivery and sensitization of students and communities to stop the spread of COVID-19.

The Government has developed an Education Sector Coronavirus Response Plan under the leadership of the Ministry of Basic and Secondary Education (MoBSE). This emergency education strategy is anchored to the broader National Response Plan under the leadership of the Ministry of Health. The Education Sector Response Plan has the objectives of: (i) ensuring that children and their families have access to relevant and timely information on COVID-19 to protect themselves from infection and reduce the transmission rate within communities; (ii) enhancing speedy recovery from the impact of COVID-19 on the education sector and improving the resilience of the sector; and (iii) ensuring continuity of learning during the initial 21-day school closure period and progressively expanding curriculum coverage using multiple curriculum delivery platforms in the medium to long-term.

1.1 Project Description

The Emergency Education COVID-19 Response Project (P174035) has the following objectives: (i) to ensure that children and their families have access to relevant and timely information on COVID-19 to protect themselves from infection and reduce the transmission rate within communities; (ii) to enhance speedy recovery from the impact of COVID-19 on the education sector and improving the resilience of the sector; and (iii) to ensure continuity of learning during the school closure and progressively expand curriculum coverage using multiple curriculum delivery platforms in the medium to long-term.
The Emergency Education COVID-19 Response Project (P174035) comprises the following four components:

- Continuity of Learning
- Safe Return to School
- Community Engagement and Communications
- Project management and Evaluation

Component 1. Continuity of Learning
Continuity of learning is not only essential to learning outcomes, but is also critical to keeping children engaged with learning so that the children are more likely to return to schools when they reopen. The economic downturn will put increasing pressure on families, which may put them in financial distress where they are less likely to send their children to school.

Sub-Component 1.1 Extending Remote Learning Opportunities.
MoBSE has already launched targeted radio, mobile, and television educational programming since schools have closed. The aim would be to support and increase these efforts so that the majority of children across the country have access to some form of education programming.

The project will support:
(i) the development (or adoption of internationally available) radio, television, and online programming; and
(ii) printed educational packets (including stationary and writing implements) with priority for the most vulnerable communities who do not have access to educational technology, based on MICs survey data, triangulated with EMIS data and Regional Education Directorate information. In addition to developing and adapting content, and establishing the online platform, this would include equipping regional radio stations with the capacity to manage and implement education programming; as well as capacity building of teachers who are subject experts and radio and television broadcasters to adapt and deliver education content across these platforms.

Building on this prior work, the project will support the network of itinerant teachers to continue to provide one-to-one support for learners with disabilities at the primary school level. This would take place through regular phone check-ins which aim to provide remote psycho-social and educational support to families, and, where possible, provision of existent accessible materials (e.g. braille readers) directly to homes.

Sub-Component 1.2 Building Resiliency Through Sustainability Measures

Sustainability measures will be implemented at the school and regional level to ensure continued access to learning opportunities, and enhanced communications networks in the case of additional emergencies and school closures. This would include:

- Development of an online platform to serve as a repository for all of the learning materials developed. The platform would ensure that education content developed is not only made available digitally for those that have mobile devices, but that school districts, teachers, and head teachers can continue to access the content post-crisis.
- Provision of routers and dongles to schools and regional offices to tap into existing internet connections being made available by the philanthropic donor MRC-Holland. This ensures easier
strategic communications at regional, district, and school level and leverages pre-existing internet access points; and,

- **Provision of radios and televisions within schools, particularly in rural communities.** Radios and televisions will not only allow for enhanced communication and learning opportunities during the traditional school year, but also allows for rural households which may be without regular access to communication technology to access critical life-saving messages and educational information in times of crises.

**Sub-Component 1.3 Supporting the Most Vulnerable**

School meals were provided by World Food Programme (WFP) in regions 1,3,5 and 6 and by the government in regions 2 and 4. However, due to the school closure, the most vulnerable students no longer have access to sufficient amounts of food. To address this, the project will finance the distribution of essential food items to the most vulnerable families and restart school meals immediately after the school reopening until the WFP returns to provide its service.

**Component 2. Safe Return to School**

The return to school will require careful planning to ensure safety of children, teachers, and education personnel aligned with health guidelines, as well as educational approaches which address missed instruction hours, and provide psycho-social support. As such, Component 2 will support activities aimed at: (i) promoting a healthy learning environment for safe reopening of schools; and (ii) providing accelerated learning opportunities, and psychosocial support to students and teachers.

**Sub-component 2.1. Healthy Schools**

To ensure that schools are prepared for reentry of students in the wake of COVID-19, the project will support efforts to ensure health and hygiene measures in schools. This will include: (i) thoroughly cleaning and disinfecting schools; (ii) provision of soap, hand sanitizer, and basic hand washing materials; (iii) a campaign (including printed materials) which promotes good hygiene and handwashing in schools; and (iv) water treatment of preexisting school water sources where water quality is found to be unsatisfactory.

**Sub-component 2.2 Accelerated Learning**

Sub-component 2.2 will support the development and implementation of accelerated learning opportunities to address the instructional hours lost during the crisis. Informed by data supported under Component 4, the accelerated learning program will provide condensed learning opportunities at the reopening of the school year, and potentially provide extended instruction time to learners.

**Component 3. Community Engagement and Strategic Communication.**

The extensive well-established networks of schools, school communities, education personnel and teachers, represent a key avenue to ensure delivery of critical messaging around health, safety, and learning both during the COVID-19 crisis, as well as during the post-crisis period when children begin returning to schools. The project will support the government to deliver critical messages related to the education emergency response strategy via multiple channels – television, radio, print, and via mass mobile messaging. These strategic communications would support the Emergency Education Response
Strategy and be focused on communicating key messages related to learning, including but not limited to: (i) school closure updates; (ii) current information on logistics, access, and availability of learning programs across all formats for students; and (iii) any education emergency response updates. The aim of the messaging is to sensitize all school communities to the availability of importance of participating in distance learning opportunities. At the same time, communications support would also be provided to reinforce messaging from the Ministry of Health around health and hygiene practices to stop the spread of COVID-19. This would include providing child and family friendly messaging about prevention of and protection from COVID-19, well-being, and psychosocial health during home based learning (including print materials, television and radio messaging, and engaging children in poetry, drama, and storytelling).

This component will support data collection, and use, as well as project management and implementation. This would include M&E of activities funded by the proposed project, high frequency surveys in which students are accessing distance learning opportunities and how often, as well as a rapid assessment of students upon their return to schools in order to adapt accelerated learning programs.

The Emergency Education COVID-19 Response Project (P174035) is being prepared under the World Bank’s Environment and Social Framework (ESF). As per the Environmental and Social Standard ESS 10 Stakeholders Engagement and Information Disclosure, the PCU of MOBSE will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation during the lifecycle of the Project.

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

2. Stakeholder identification and analysis
Project stakeholders are defined as individuals, groups or other entities who:
(i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
(ii) may have an interest in the Project (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups’ interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for
dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way. With community gatherings limited or forbidden under COVID-19, it may mean that the stakeholder identification will be on a much more individual basis, requiring different media to reach affected individuals.

2.1 Methodology

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

- **Openness and life-cycle approach**: public consultations for the project(s) will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation.
- **Informed participation and feedback**: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns.
- **Inclusiveness and sensitivity**: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders, at all times, are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders’ needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly and the cultural sensitivities of diverse ethnic groups.
- **Flexibility**: if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet communication. (See Section 3.2 below).

For the purposes of effective and tailored engagement, stakeholders of the proposed Emergency Education COVID-19 Response Project (P174035) can be divided into the following core categories:

- **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status\(^1\) and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

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\(^1\) Vulnerable status may stem from an individual’s or group’s race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.
2.2. Affected parties

Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Students (including learners with disabilities)
- Education staff including teachers and assistants
- Members of the Parent/Teachers’ Associations
- Members of the Mothers’ clubs
- School Management Committees and School Boards.
- Communities living near schools
- Communities from other villages or localities which have children attending schools
- Family members of students and education staff (teachers and assistants, cooks, caretakers, etc.)
- Cooks and caretakers of schools
- Contractors, suppliers, and their workers
- Health service workers
- Village Development Committees, including women, youth and elder councils
- Guardians of school children
- Alkalos (chiefs)

2.3. Other interested parties

The projects’ stakeholders also include parties other than the directly affected communities, including:

- The Ministry of Basic and Secondary Education
- Ministry of Higher Education, Science, Technology & Research
- Ministry of Finance & Economic Affairs
- Ministry of State for Women’s Affairs
- Ministry of Youth and Sports
- Communication, media and telecommunication companies
- Designers and other communication specialists
- Local contractors and suppliers
- Traders in food and other commodities (sanitizers, masks, and soap)
- NGOs active in the education and health Sectors, including NGOs working with children and learners with disabilities
- NGOs and other organizations working with survivors of gender-based violence and violence against children
- International/multilateral agencies supporting the education sector

2.4. Disadvantaged / vulnerable individuals or groups

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

Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following: students and education staff with disabilities, women headed households or single mothers with minor children, students with unemployed parents or parents with disabilities, households which do not have electricity or/and digital connectivity, households with members working in the informal sector, the elderly, linguistic minorities, illiterate persons, and households which are food insecure. 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.

3. Stakeholder Engagement Program

3.1. Summary of stakeholder engagement done during project preparation

During preparation, consultation meetings were conducted with the Project Coordination Unit of the Ministry of Basic and Secondary Education. Participants were the Project Manager and the Construction Programme Manager on May 15, 2020. The meetings took place in the conference room of the PCU and to avoid crowding and practice social distancing participants were limited to four (comprising the two consultants and the two staff members of the PCU). There were no handshakes and handwashing was available at the entrance of the building and hand sanitizers were provided in the conference room together with masks.

The Ministry of Health was also consulted on April 22, 2020 to seek guidance regarding the measures needed to be put in place during the Project implementation to stop the spread of the pandemic. The consultations focused on fumigation of schools at the time of reopening, the provision of hand sanitizers and detergents for schools as well as sensitization of students, teachers and communities around schools on COVID-19 to reduce the spread of the pandemic whilst emphasizing the need to ensure access to education for the students in the present context. These points such as handwashing and sanitizers, sensitization of students, teachers and contractors as well as the local communities living around the schools are reflected in the project design.

Similarly, on April 10 and May 11, media houses were consulted to discuss the possibility and feasibility of extending the delivery of education programming and lessons using television and radio broadcasting.

The speed and urgency with which this project has been developed to meet the growing threat of COVID-19 in the country, combined with recently-announced government restrictions on gatherings of people has limited the project’s ability to develop a complete SEP before this project is approved by the World Bank. This SEP and the Environmental and Social Management Plan (ESMP) that will be prepared under
the project will be updated, consulted on and disclosed within 30 days after the project effectiveness date. The SEP will be continuously updated throughout the project implementation period, as required.

3.2. Summary of project stakeholder needs, methods, tools and techniques for stakeholder engagement

The project will explore various options for engaging stakeholders in this challenging environment, and they will be developed more fully when this SEP is updated no later than 30 days after project effectiveness. A precautionary approach will be taken to the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting channels of communication, given the public engagement limitations as a result of the COVID-19 pandemic:

- Avoid public gatherings (considering national restrictions or advisories), including public hearings, workshops and community meetings
- As smaller meetings are permitted (five people with a distance of 1.5m between participants), consultations will be conducted in small-group sessions, such as focus group meetings. Efforts will be made to conduct meetings through online channels to reduce risk of contagion or contamination when possible
- Diversify means of communication and rely more on social media and online channels, when possible. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders to do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

An important guidance on communications and stakeholder engagement that the Project will draw on is the World Health Organization’s (WHO) “COVID-19 Strategic Preparedness and Response Plan: Operational Planning Guidelines to Support Country Preparedness and Response” (2020). This guidance outlines the following approach under Pillar 2: Risk Communication and Community Engagement. It will form the basis for the Project’s stakeholder engagement approach. The project will also draw on other recently available resources for carrying out stakeholder engagement in the context of COVID-19, including the World Bank’s “Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” (March 20, 2020).

In line with the above precautionary approach, different engagement methods are proposed and cover different needs of the stakeholders as below:

- Consultation meetings
- Focus group meetings
- One on one interviews
- Public notices (including in local and national newspapers, radio, TV)
- Electronic publications and press releases on the MoBSE TV, radio and website
- Telephonic interview
- Text messages
- Social media

### 3.3. Proposed strategy for information disclosure

The table below describes how information will be shared and consulted upon with the stakeholders.

<table>
<thead>
<tr>
<th>Project stage</th>
<th>Target stakeholders</th>
<th>List of information to be disclosed</th>
<th>Methods and timing proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Before Appraisal</td>
<td>• Ministry of Health and the Task Force dealing with COVID-19</td>
<td>• Preparation of project documents PAD and Relevance E&amp;S documents</td>
<td>• Consultation meetings (including via remote methods such as video conferencing)</td>
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<td></td>
<td>• Ministry of Finance &amp; Economic Affairs</td>
<td>• GM procedure, including procedures on SEA/SH</td>
<td>• Focus group meetings</td>
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<td></td>
<td>• World Bank Staff</td>
<td>• Regular updates on Project development</td>
<td>• Official correspondence</td>
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<td></td>
<td>• Relevant Departments at the Ministry of Education</td>
<td>• Financing Agreement</td>
<td>• Workshops</td>
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<td></td>
<td></td>
<td></td>
<td>• At initial stage of project identification</td>
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<tr>
<td>During ESMP and LMP Elaboration</td>
<td>• Education Regional Offices</td>
<td>• ESMP requirements</td>
<td>• Public notices</td>
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<td></td>
<td>• Regional Health Centers</td>
<td>• GM Procedure, including for SEA/SH reporting</td>
<td>• Electronic publications and press releases on the MoBSE, TV, radio and website</td>
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<td></td>
<td>• Governors (Regional COVID-19 Task Force)</td>
<td>• Safety and security measures and precautions for school staff and students</td>
<td>• Telephonic interview</td>
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<td></td>
<td>• Police</td>
<td>• Project components and activities</td>
<td>• Focus group meetings</td>
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<tr>
<td></td>
<td>• Teachers Unions and Parents Associations</td>
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<td>• Workshops</td>
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<td></td>
<td>• NGOs and service providers for SEA/SH and persons/children with disabilities</td>
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<td>• 30 days after project effectiveness</td>
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<td></td>
<td>• Fire and Rescue Service</td>
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<td></td>
<td>• Community leaders (including women, youth and elder councils)</td>
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<td></td>
<td>• Village Development Committees and Alkalos</td>
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<tr>
<td>During Project Implementation</td>
<td>• Contractors</td>
<td>• ESMP requirements</td>
<td>• Television, radio, print, and mass mobile messaging</td>
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<td></td>
<td>• Teachers, assistants and students</td>
<td>• GM Procedures including for SEA/SH reporting</td>
<td>• Focus group meetings</td>
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<tr>
<td></td>
<td>• Affected communities</td>
<td>• Availability and importance of participating in distance learning opportunities</td>
<td>• Public notices</td>
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<tr>
<td></td>
<td>• Other school staff (cooks, cleaners, watchpersons)</td>
<td>• Message on health and hygiene practices to stop the spread of COVID-19</td>
<td>• Press releases and interviews on the MOBSE, website</td>
</tr>
<tr>
<td></td>
<td>• NGOs supporting children with disabilities and SEA/SH</td>
<td></td>
<td>• These activities will be conducted throughout project implementation</td>
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<td></td>
<td>• Parent Teachers Associations</td>
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<td></td>
<td>• Police</td>
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</tbody>
</table>
3.4. Stakeholder engagement plan

<table>
<thead>
<tr>
<th>Project stage</th>
<th>Topic of consultation / message</th>
<th>Method used</th>
<th>Target stakeholders</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Before Appraisal</strong></td>
<td>• Project design and content</td>
<td>• Correspondence by phone/email</td>
<td>• Ministry of Health and the Task Force dealing with COVID-19</td>
<td>• Ministry of Basic and Secondary Education through the Projects Coordination Unit to coordinate and develop messaging, delivery options and lead discussions</td>
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<td></td>
<td>• Safeguard instruments</td>
<td>• One-on-one interviews</td>
<td>• Ministry of Finance &amp; Economic Affairs</td>
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<td></td>
<td>• ESMP and LMP requirements</td>
<td>• Formal meetings</td>
<td>• Relevant Department at the Ministry of Education</td>
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<td></td>
<td>• GM Procedure</td>
<td>• Roundtable discussions</td>
<td>• NGOs active in the education sectors, including learners with disabilities</td>
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<td></td>
<td>• Capacity training</td>
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<td>• International development partners</td>
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<td></td>
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<td></td>
<td>• Ministry of Basic and Secondary Education through the Projects Coordination Unit to coordinate and develop messaging, delivery options and lead discussions</td>
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<td></td>
<td></td>
<td></td>
<td>• Ministry of Finance &amp; Economic Affairs</td>
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<tr>
<td><strong>During ESMP and LMP Development</strong></td>
<td>• ESMP and LMP requirements</td>
<td>• Telephone/Mobile Interview</td>
<td>• Regional Health Centers</td>
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<td></td>
<td>• GM Procedures, including SEA/SH reporting procedures</td>
<td>• Focus group meetings</td>
<td>• Governors (Regional COVID-19 Task Force)</td>
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<tr>
<td></td>
<td>• Precautionary health and safety approaches and measures</td>
<td>• Public notices</td>
<td>• Police</td>
<td></td>
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<td></td>
<td>• Safety and security measures for staff</td>
<td>• Press releases on the MOBSE tv, radio and website</td>
<td>• Teachers Unions and Students’ Parents</td>
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<td>• Fire and Rescue Service</td>
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<td></td>
<td></td>
<td></td>
<td>• Ministry of Basic and Secondary Education through the Projects Coordination Unit to coordinate and develop messaging, delivery options and lead discussions</td>
<td></td>
</tr>
</tbody>
</table>
### During Project Implementation

- ESMP and LMP requirements
- GM procedure including SEA/SH reporting
- Importance of participating in distance learning opportunities
- Communication strategy to address the challenges and impacts of COVID-19
- Information on mitigation measures and hygiene practices to stop the spread of COVID-19
- Monitoring of food and education materials delivery and use by students
- Challenges faced by students to access education materials and learning opportunities

- Letters and calls to community leaders, including youth, women and elders
- Traditional notifications
- Disclosure of Project documentation in a culturally appropriate and accessible manner such as community meetings (or VDC meetings), considering language requirements and literacy
- Focus group discussions
- Press releases on the MOBSE tv, radio and website
- Text messages and social media

- Contractors and entrepreneurs
- Teachers and students
- Affected communities and vulnerable groups
- Other school staff
- NGOs (including those working with children with disabilities, SEA/SH)

- Ministry of Basic and Secondary Education through the Projects Coordination Unit
- Throughout project implementation

### 3.5. Proposed strategy to incorporate the view of vulnerable groups

The project will carry out targeted stakeholder engagement with vulnerable groups to understand concerns and needs in terms of accessing information (including access to electricity and digital, linguistic requirements and literacy, physical and cognitive disabilities), medical facilities and services and other challenges they face at home (including access to food, water/hygiene), at schools, at workplaces and in their communities. The details of strategies that will be adopted to effectively engage and communicate to vulnerable groups will be considered during project implementation.

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2 Examples may include (i) women: ensure that community engagement teams are gender-balanced and promote women’s leadership within these, design online and in-person surveys and other engagement activities so that women in unpaid care work can participate; consider provisions for childcare, transport, and safety for any in-person community engagement activities; (ii)
3.6. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism (GM).

4. Resources and Responsibilities for implementing stakeholder engagement activities

4.1. Resources

The environmental and social team of the Coordination Unit will be in charge of stakeholder engagement activities. The environmental and social team will also have capacity to undertake consultations with vulnerable groups (including with women).

The budget for the SEP is included in component 4 - Technical and Institutional Support - of the project.

4.2. Management functions and responsibilities

The project implementation arrangements are as follows:

The Ministry of Basic and Secondary Education (MoBSE) will be the implementing agency. The project will utilize the project coordination unit (PCU) managing the current Education Sector Support Program (GESEP – P162890) which has been effective since August 2018. While the PCU has functioned in a satisfactory manner in previous World Bank projects and in the current GESEP, it currently lacks full time environmental and social specialists. The project has been supported by an environmental and a social consultant on a part-time basis. However, full time environmental and social specialists will be recruited as a matter of high priority, with the process of recruitment currently underway. To support the capacity of the PCU, the two consultants will continue in their roles to provide project support and will assist with capacity development of recruited staff. In addition, the World Bank will provide ESF capacity support and training in addition to the environmental and social consultants to bolster environmental and social risk management in the project at this initial phase.

The PCU of GESEP will be in charge of the day-to-day management of the project. This includes: i) coordinate the project activities; (ii) ensure the financial management of the project activities in all components; (iii) prepare consolidated annual work plans, budgets, monitoring and evaluation reports (M & E ), and the implementation report of the project to be submitted to the Steering Committee and the Association (IDA). The environmental and social team of the Project Coordination Unit will be directly responsible for carrying out stakeholder engagement activities, in consultation with other members of the PIU.

The stakeholder engagement activities will be documented through:

Pregnant women: develop education materials for pregnant women on basic hygiene practices, infection precautions, and how and where to seek care based on their questions and concerns; (iii) Elderly and people with existing medical conditions: develop information on specific needs and explain why they are at more risk & what measures to take to care for them; tailor messages and make them actionable for particular living conditions (including assisted living facilities), and health status; target family members, health care providers and caregivers; (iii) People with disabilities: provide information in accessible formats, like braille, large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for hearing impaired, online materials for people who use assistive technology; and (iv) Children: design information and communication materials in a child-friendly manner & provide parents with skills to handle their own anxieties and help manage those in their children.
5. Grievance Mechanism

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

Specifically, the GM will:

- Provide affected people with different avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Be accessible and inclusive and considers the needs of vulnerable and disadvantaged groups
- Ensure that appropriate, effective, timely and mutually acceptable resolutions are identified and implemented to the satisfaction of complainants
- Be transparent, fair and accountable
- Maintain accurate records of all grievances and document all developments and outcomes and track the progress until resolution
- Include an appeals process and serves as an avenue for effective grievance process to avoid judicial proceedings

5.1. Description of GM

Grievances will be handled at the Project level by environmental and social team which will be trained on consultation, GM handling and inclusion of disadvantaged persons and vulnerable groups, including addressing SEA/SH. The project will use the GM of the current project (GESSP).

The GM will include the following steps and indicative timelines:

<table>
<thead>
<tr>
<th>Stage</th>
<th>Process</th>
<th>Duration</th>
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<tr>
<td>1</td>
<td>The Aggrieved Party (AP) will take his/her grievance to the project or construction site supervisor (CSS)/Contractor Liaison Officer (CLO) who will endeavour to resolve it immediately. Where AP is not satisfied, the CSS or CLO will refer the AP to the Project’s Contact Person (PCP). For complaints that were satisfactorily resolved by the CSS/CLO, he/she will inform the PCP and the PCP will log the grievance and the actions that were taken. Before construction starts, the complainant will address his/her complaint directly to the project via the Project Community Liaison Officer (or Alkalos or VDCs who will be the representative of the Project Community Liaison Officer in each affected community) who will submit the case to the Grievance Redress Committee (GRC). VDC and Alkalo will be trained in order to inform the CLO as soon as they receive a complaint.</td>
<td>Anytime</td>
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On receipt of the complaint, the Project PCP will endeavour to resolve it immediately. If unsuccessful, he/she then notifies PCU Project Manager immediately after logging grievance.

The PCU Project Coordinator will endeavour to address and resolve the complaint by submitting it to the GRC and inform the aggrieved party after the Grievance Redress Committee has taken a decision regarding his/her complaint. The PCU Project Manager will also refer to the MOBSE Permanent Secretary other unresolved grievances for his/her action at the level of the Project Steering Committee.

If the matter remains unresolved, or complainant is not satisfied with the outcome at the project level (by the GRC), the PCU Project Manager or MOBSE Permanent Secretary, will then refer the matter to the National Steering Committee (NSC) for a resolution.

If it is a land related issue, the MOBSE Permanent Secretary may seek the assistance of the Physical Planning MD and Permanent Secretary of Ministry of Lands and Local Government.

If the issue remains unresolved then the complainant should be advised of his/her right to legal recourse.

The GM will provide an appeal process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse.

It is important to have multiple and widely known ways to register grievances. Anonymous grievances can be raised and addressed through phone calls, unsigned letters/forms, emails, etc.. Several uptake channels under consideration by the project include:

- Toll-free telephone hotline will be maintained and managed by the PIU, the specifics of which will be further developed SEP when the updated (within 30 days after project effectiveness).
- E-mail-
- Written letters submitted to Grievance focal points at school facilities
- Complaint forms to be submitted via any of the above channels
- Walk-ins may register a complaint on a grievance logbook at school facilities or suggestion box at clinic/hospitals

Cases involving GBV/SEA/SH/VAC: For sensitive issues regarding Sexual Harassment, Sexual Exploitation and Abuse or Violence Against Children, an exceptional or ad hoc meeting will be called the day after receiving this information. The Grievance Redress Committee, the National Steering Committee, the MOBSE Gender Unit, the contractor, and local authorities of the locality where this issue occurs will all meet as a plenary. At all times, the approach for such issues will follow a survivor-centred approach and the anonymity of the survivor will remain intact. In addition, the survivor will have been informed of options such as receiving psycho-social social support, medical assistance and other services as required.
**GBV/SEA/SH/VAC Compliance Team (GSVCT):** For those issues, the Response Protocol which is the mechanism set in place to respond to cases of SEA, SH and VAC will be implemented. By doing so, the contractor will first establish a ‘**GBV, SEA, SH and VAC Compliance Team**’ (GCCT). The GCCT will include, as appropriate to the project, at least four representatives (‘Focal Points’) as follows:

- A social or environmental safeguards officer trained by the GBV Consultant
- The occupational health and safety manager from the contractor, or someone else tasked with the responsibility for addressing GBV and VAC with the time and seniority to devote to the position, he will also be trained by the GBV Consultant;
- A representative from a local service provider with experience in GBV and VAC (the ‘Service Provider’).
- A representative from the MOBSE Gender Unit

Once a complaint has been received, by any and all channels, it should be recorded in the grievance logbook which is included in Annex A.

### 6. Monitoring and Reporting

#### 6.1. Involvement of stakeholders in monitoring activities

The Project will make available grievance forms in every village (Alkalo or VDC) as an accessible venue for filing a grievance and will discuss with the VDC and Alkalo requirements to consider social distancing measures. A literate member of the VDC or one of the members of the Parent Teachers’ Association will help in completing the forms. Code of Conduct will be developed and signed by these people to ensure they will respect the confidentiality of the complaints and complainants. Every two weeks, community liaison officers will collect forms filled out to submit them to the GRC. The E&S social team will also call VDC’s and the Alkalo every month to check in on any grievances or concerns which may have been brought to them, as well as speak with a member of the women and elder councils.

#### 6.2. Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year will be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project’s interaction with the stakeholders.
- Several Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
  - Number of Consultation meetings and other public discussions
  - Number of community sensitization and training on GM handling activities
  - Number of press releases published or broadcasted in MOBSE and local, regional and nation media
- Number of training program on GM management for main Project stakeholders
- Number of grievances from staff and communities
- Number of grievances received from persons or vulnerable groups
- Number of grievances resolved within the prescribed timeline
- Number of complaints received regarding GBV/SEA/SH
## Annex A: Grievance logbook

<table>
<thead>
<tr>
<th>Case number</th>
<th>Date Claim Received</th>
<th>Name of Person Receiving Complaint</th>
<th>Where/how the complaint was received</th>
<th>Name &amp; contact details of complainant (if known)</th>
<th>Content of the claim (include all grievances, suggestions, inquiries)</th>
<th>Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication)</th>
<th>Expected Decision Date</th>
<th>Decision Outcome (include names of participants and date of decision)</th>
<th>Was Decision communicated to complainant? Y/N If yes, state when and via what method of communication</th>
<th>Was the complainant satisfied with the decision? Y/N If no, explain</th>
<th>Any follow up action?</th>
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