

**GOVERNMENT OF THE KINGDOM OF LESOTHO**

**MINISTRY OF EDUCATION AND TRAINING**

**LESOTHO EDUCATION IMPROVEMENT PROJECT**

**(P500587)**

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**Volume 2: The SEP**

**STAKEHOLDER ENGAGEMENT PLAN**

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| **Prepared for:** | **Ministry of Education and Training**  **Maseru**  **Lesotho** |

**23rd April 2024**

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**Stakeholder Engagement Plan (SEP)**

**The Lesotho Education Improvement Project (LEIP)** **Stakeholder Engagement Plan (SEP) forms part of a series which is intended to provide complete documentation for the requirements of a holistic Environmental and Social Safeguards management system for the project. This Report contains the findings of a study conducted for the Education sector of the Kingdom of Lesotho and the instrument has been developed based on the local conditions and findings.**

**The following documents form the series:**

1. **Volume 1: The SEP**

**LESOTHO EEDUCATION IMPROVEMENT PROJECT (LEIP)**

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

1. **Volume 2: The ESCP**

**LESOTHO EDUCATION IMPROVEMENT PROJECT (LEIP)**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)**

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**The Minister of Education and Training**

**Attention: The Principal Secretary of Ministry Education and Training**

**Ministry of Education and Training**

**Maseru**

**Lesotho**

## LIST OF ABBREVIATIONS

BESP Basic Education Strengthening Project

CRC Convention on the Rights of the Child

CPF Country Partnership Framework

DEO District Environmental Officer

DoP Department of Planning

EA Environmental Assessment

E&S Environment and Social

ECD Early Childhood Development

ECCD Early Childhood Care and Development

EIA Environmental Impact Assessment

EIS Environmental Impact Study

ESCP Environmental and Social Commitment Plan

ESF Environmental and Social Framework

ESIA Environmental and Social Impact Assessment

ESMF Environmental and Social Management Framework

ESMP Environmental and Social Management Plan

ESS Environmental and Social Standards

ECCD Early Childhood Care and Development

ECE Early Childhood Education

ECoL Examinations Council of Lesotho

EGR Early Grade Reading

EMIS Education Management and Information System

ESA Education Sector Analysis

ESSP Education Sector Strategic Plan

GBV Gender Based Violence

GDP Gross Domestic Product

GER Gross Enrolment Ratio

GIIP Good International Industry Practice

GoL Government of Lesotho

GRM Grievance Redress Mechanism

GRC Grievance Redress Committee

GPE Global Partnership for Education

HCI Human Capital Index

HIV Human Immunodeficiency Virus

IECCD Integrated Early Childhood Care and Development

ICT Information and Communication Technology

KRA key result areas

LBEIP Lesotho Basic Education Improvement Project

LEIP Lesotho Education Improvement Project

LEQEP Lesotho Education Quality Enhancement Project

LCE Lesotho College of Education

LEG Local Education Group

LEQEP Lesotho Education Quality Enhancement Project

LMIC Lower Middle-Income Country

LMP Labour Management Procedure

ILO International Labour Organization

MCST Ministry of Communication, Science and Technology

M&E Monitoring and Evaluation

MDP Ministry of Development Planning

MELQO Measurement of Early Learning and Quality Outcomes

MFDP Ministry of Finance and Development Planning

MICS Multiple Indicator Cluster Survey

MoET Ministry of Education and Training

MoF Ministry of Finance

MoSD Ministry of Social Development

MTEC Ministry of Tourism, Environment and Culture.

NCDC National Curriculum and Development Centre

NEP National Environmental Policy

NES National Environmental Secretariat

NGO Non-Governmental Organization

NIP National Implementation Plan

NSDP National Development Strategic Plan

NISSA National Information System for Social Assistance

NJCTL New Jersey Centre for Teaching and Learning

OHS Occupational Health and Safety

OVC Orphans and Vulnerable Children

PAP Project Affected People

PDO Programme Development Objective

PEP Post-Exposure Prophylaxis

PFU Project Facilitation Unit

PS Principal Secretary

SDG Sustainable Development Goal

SEA Sexual Exploitation and Abuse

SEP Stakeholder Engagement Plan

SP Social Protection

UN United Nations

UNDP United Nations Development Programme

UNICEF United Nations Children's Fund

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# 1. Introduction

The Ministry of Education and Training (MoET) of the Government of the Kingdom of Lesotho (GoL) has set the attainment of quality universal education as a major objective in its current Education Strategic Plan. The MoET is currently intending to implement the project by the name of Lesotho Education Improvement Project (LEIP) over the period of five years with support from the World Bank to assist in meeting this objective.

LEIP proposed Project Development Objective (PDO) isto improve quality of teaching and learning in junior secondary and primary and enhance physical learning environments and conditions in targeted primary and secondary schools.

## 1.2. The Proposed Project Components

**Table 1** **Proposed Project Components and Sub-Components**

|  |  |
| --- | --- |
| **Component 1:** Improving quality of teaching and learning in primary education (US$ 3.3 million) | **Subcomponent 1.1.** Scaling up online training models in mathematics and science for junior secondary school teachers (US$1.5 million). |
| **Subcomponent 1.2**. Strengthening Foundational Learning (FLN) in Literacy and Numeracy in Primary Schools in Grades 1-3 (US$1.5 million |
| **Subcomponent 1.3**. Development and implementation of National Learning Assessment in Grade 9 (US$ 0.3 million). |
| **Component 2.** Enhance physical learning environment and conditions in primary and secondary schools (US$ 15 million) | **Subcomponent 2.1**. Improving infrastructure in targeted primary schools (US$10 million). |
| **Subcomponent 2.2**. Construction of laboratories in targeted secondary schools (US$5 million)**.** |
| **Component 3:** Strengthen project management, technical assistance, and governance of education system (USD 1.7 million) | **Subcomponent 3.1.** Decentralization of Teachers Service (USD 0.5 million). |
| **Subcomponent 3.2.** Project monitoring, evaluation, management, environment and social safeguards, procurement, financial management, and audit (US$ 1.2 million) |

The Project will be implemented in all ten districts and is comprised of various sub-projects with different levels of environmental and social impacts and located at various locations throughout the country.

The Ministry of Education and Training came to an understanding that component 1 and 2 of the project activities will pose variuos environmental and social risks to number of stakeholders durinng both project planning and implementation therefore a need of Stakeholders Engagement Plan formulation. The stakeholders engagement plan is informed and aligned with the World Bank Environment and Social Standard 10 (ESS10) of the World Bank Policies on ESMF. ESS10 recognizes the importance of open and transparent engagement between the Borrower(Government of the Kingdom of Lesotho) and project stakeholders as an essential element of good international practice. This Stakeholder Engagement Programme (SEP) has been prepared by Ministry of Education and Training (MoET), in consultation with World Bank. SEP has been prepared as part of the Environmental and Social Impact Assessment (ESIA) for the proposed Lesotho Education Improvement Project (LEIP) of the Government of Lesotho through its Ministry of Education and Training. The document will be updated and refined by the LEIP throughout the life cycle of the project. The SEP will adopt the lessons learned from the newly similar just implemented Lesotho Quality for Quality Education of the Ministry of Education and the current Basic Education Strengthening Project. It will be an operational tool to define the protocols for effectively engaging local and affected communities in the overall project development, disseminate activities, outputs and results, coordinate and hold consultations and develop clear channels of communication of the project to all relevant stakeholders and target audience. It will also describe the agreed Grievance Mechanisms that will be available for project affected/interested/citizen of Lesotho, thus for sending their claims, observations and requests to the project team.

# Overview of Stakeholders Engagement

## 2.1. Definition of Stakeholders Engagement Plan

Stakeholder engagement is defined as the systematic identification, analysis, planning and implementation of actions designed to influence stakeholders. A stakeholder engagement strategy identifies the needs of key groups and the sponsors’ vital role in ensuring those business needs are met. It is actual involves a group or individual who can affect or is affected by the achievement of the organization's objective.” It is about knowing who your stakeholders are, understanding them and knowing how best to involve them in your business. It involves identifying, understanding and involving people who have a stake in the outcome of the plan. It also requires a comprehensive approach that includes ongoing communication, listening, and collaboration.

The SEP outlines the engagement process to be undertaken as part of the Environment and Social Impact Assessment (ESIA) stage. It is a formal strategy to provide equal opportunities for engagement and participation to the affected, interested, concern stakeholders to be in the project and to define effective communication strategies with the different project stakeholders.

In terms of communication, the SEP specifies the frequency and type of communications, media, contact persons, and locations of communication events. SEP identifies actions required to promote productive involvement of stakeholders in decision making and execution. It describes the timing and methods of engaging with stakeholders and range of information to be communicated to them as well as information to be sought from them throughout the life cycle of the project.

The SEP will inform the GoL to provide stakeholders with timely, relevant, understandable and accessible information; consult with them in a culturally appropriate manner which is free of manipulation, interference, coercion, discrimination and intimidation. It also considers the main characteristics and interests of stakeholders, different level of engagement and consultation that will be appropriate for different stakeholders throughout preparation and implementation.

Stakeholder Engagement Plan (SEP) will assist different LEIP and other implementing agencies in managing and facilitating future engagement through the various stages of the Project’s life cycle from design phase of the project through to construction, liability period and closure. This SEP details engagement undertaken by the MoET with the different project stakeholders during the stage of the Project preparation and serves as a guide to engagement during the Project early stages of creation of Grievance Redress Mechanism committees (GRCs). This SEP will need to be revised following Project progress to inform on-going stakeholder’s engagement through the various stages of Project construction, liability period and closure.

# 3.0. Objective/Description of SEP

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. It is further meant to improve and facilitate decision making and create an atmosphere of understanding that actively involves both project – affected people and other project stakeholders as according to the World Bank Environment and Social Standards with specific focus to ESS10. ESS10 recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. It is further meant to ensure that the project affected groups are provided with sufficient opportunity to voice their opinions and concerns that may influence project decision with regards to potential environment and social risks that make occur as a result of the project implementation.

The SEP is part of the operational manual that will define the procedures for engaging with communities and relevant stakeholders, consultations and communication between GoL and all relevant parties in LEIP. It seeks to achieve the following key objectives:

**The Key Objectives of the SEP can be summarised as follows:**

1. Define procedures for the project stakeholder engagement such that it meets the Environmental Social Standard 10, International Best Practice and national and international regulations.
2. Identify key stakeholders that are relevant in project implementation affected, and/or able to influence the project and its activities.
3. To establish a systematic approach to stakeholder engagement that will help GoL, and the project identify stakeholders build and maintain a constructive relationship with them, in particular affected and interested stakeholders
4. Describe the communication protocols and channels the project will use to communicate with the different types of stakeholders.
5. To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be considered in project design and environmental and social performance.
6. To promote and provide means for effective and inclusive engagement with Project Affected People (PAP) throughout the project life cycle on issues that could potentially affect them.
7. 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.
8. Define the protocols for consultation with affected communities, interested and relevant stakeholders,
9. To provide PAPs with accessible and inclusive means to raise issues and grievances and allow GoR to respond to and manage such grievances.
10. Define roles and responsibilities for the implementation of the SEP.
11. Guide the GoL to build mutually respectful, beneficial and lasting relationships with stakeholders.
12. To share and informed stakeholders about the project objectives, the types of investments and activities that are going to be funded by the project, timeline, contractors, locations of works, environmental and social measures taken to reduce negative impacts to the public health, safety, land property, transit, etc.
13. To maximize the impact of the project by making the results and deliverables of the project available to the stakeholders and to the wider audience.

# 4.0. Key Environmental and Social Standards and Legislation Guiding Stakeholders Engagement

The LEIP SEP takes into consideration the existing national and international institutional regulatory framework that guarantees the right of speech, reunion, access of information, participation, etc. within the context of Lesotho Regulations and Frameworks. The following are national and international legislations relevant to this SEP

## 4.1. Relevant National Legislation

The following is a summary of the relevant national legislation for the LEIP project.

**Table 2: Summary of Legislation and Guidelines**

|  |  |  |
| --- | --- | --- |
|  | **Legislation** | **Purpose** |
| 1. | The Constitution of Lesotho | Section 36 of the Constitution of Lesotho lays the foundation for environmental and social legislation and stipulates that Lesotho will adopt policies designed to protect and enhance the natural and cultural environment of Lesotho for the benefit of both present and future generations and shall endeavour to ensure for all citizens, a sound and safe environment adequate for their health and well-being. |
| 2 | The National Environment Act No.10 of 2008 as Amended | Environment Act makes provision for the protection and management of the environment and conservation and sustainable utilization of natural resources of Lesotho. The Act emphasizes on the use and conservation of the environment and natural resources of the Basotho nation for the benefit of both present and future generations, taking into account the rate of population growth and the productivity of available resources and to require prior environmental impact assessment of proposed projects or activities which are likely to have adverse effects on the environment or natural resources (GoL, 2008a). |
| 2. | National Environmental Policy (1998) | Was crafted to protect the environment in the face of all developmental activities that may be undertaken in Lesotho. Its mission is “to promote and ensure that the present and future development of Lesotho is socio-economically and environmentally sustainable”, while its goal is to protect and conserve the environmental with a view to achieving sustainable development for Lesotho. |
| 4. | Local Government Act 1997 | The Local Government has decentralized community service delivery through the Community Councils. The District Council being the overseer of the Council’s activities or development in the Councils.  To this end, Community Councils have the power to make by-laws in the education sector. |
| 5. | The Labour Code Order 1992 | Sets out that every employer shall, so far as is reasonably practicable, ensure the safety health and welfare at work of all of his or her employees, by providing and maintaining plant, systems of work, and a working environment for his or her employees that is clean, safe, without risks to health and adequate as regards sanitation facilities and arrangements for their welfare at work; and making arrangements for ensuring, safety and absence of risks to health in connection with the use, handling, storage and transportation of articles and substances. |
| 6. | National Health Policy (2011) | Commits the Government to equitable access to a standard quality of health services for all. This will be implemented through the District Health Package which provides Essential Health Services package components free of charge or highly subsidized to all citizens.  The vision of the policy ids to have a healthy nation, living a quality and productive life. Its mission is to enhance a system that will deliver quality health services efficiently, effectively and equitably to all Basotho. |
| 10. | Education Act 2010 | Governs and regulates the administration of schools, teachers and all other matters relating to education in Lesotho. It is pursuant to the principle of provision of education of the people of Lesotho, and in particular, ensuring that amongst others (a) every child is provided with opportunities and facilities to enable him to develop physically, mentally, morally, spiritually and socially in a healthy, normal manner and in conditions of freedom and dignity. |
| 11. | National Strategic Development Plan (NSDP) 2012/13-2016/17  Istanbul Programme of Action (IPoA)  **Human and Social Development** | The main objectives are to:   * Reduce infant and child morbidity and mortality rates, Malnutrition and maternal mortality rate. * improve quality, quantity and retain skilled health professionals/personnel, procurement and dispensing systems for pharmaceuticals and essential supplies. * Improve quality and access to laboratory services. * Increase coverage and access to education services. * Strengthen the management and accountability of education facilities and systems, partnerships with the private sector, NGOs, churches and development partners.   **Social Protection:**  The main objective is to consolidate and improve efficiency of social protection systems and enhance coverage of selected interventions; Increase capacity of able-bodied persons to deal with vulnerability; Improve work safety and ease jo search and Increase capacity for disaster risk management at household, community and national level. |

## 

## 4.2. World Bank Environment and Social Safeguards

The proposed project is being developed with the support of the World Bank. In developing this SEP all environmental and social assessments carried out under this assignment are in accordance with World Bank Environmental and Social Standards (ESS).

The operations of the World Bank (WB) are guided by a comprehensive set of policies and procedures, dealing with the Bank’s development objectives and goals, the instruments for pursuing them, and specific requirements for Bank-financed operations. The core of this guidance lies in the Bank’s ESSs, which are critical to ensuring that potentially adverse environmental/social consequences are identified, minimised and mitigated so as to prevent “undue harm to people and their environment in the development process”. The ESSs of relevance to the project for consideration are:

* **ESS 1: Assessment and Management of Environmental and Social Risks and Impacts**

ESS 1 sets out the Borrower’s responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs),

* **ESS 2: Labour and Working Conditions**

ESS 2 recognises the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions,

* **ESS 3: Resources Efficiency and Pollution Prevention and Management**

ESS 3 recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resources use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable.

* **ESS 4: Community Health and Safety**

ESS 4 recognizes that project activities, equipment and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities.

* **ESS 10: Stakeholder Engagement and Information Disclosure**

ESS 10 recognizes the importance of open and transparent engagement between the Borrower and the project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

# 5.0. Stakeholder identification and analysis

Stakeholder identification and analysis is an essential component of effective and meaningful stakeholder engagement activities. The objective of this step is to provide a general overview of all stakeholders. Project stakeholders are defined as individuals, groups or other entities who:

1. are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
2. may have an interest in the Project (‘interested parties’). They include individuals or groups whose interests that may be affected by the Project or who have the potential to influence the Project outcomes in any way.

In order to develop an effective SEP, LEIP will identify stakeholders based on various factors that include their relevance, understanding their needs and expectations for engagement, their interest and objectives in relation to the Project. As part of this process, it will be particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the project because of their marginalized or vulnerable status.

In general, the nature, scope, and frequency of stakeholder engagement will be proportional to the project and its potential risks and impacts, and as the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group shall intensify and deepen in terms of the frequency and the intensity of the engagement method used. All engagements shall proceed on the basis of culturally acceptable and appropriate methods for each of the different stakeholder groups targeted.

In regard to the above, the identification process found a number of stakeholders with direct or indirect interests in LEIP, those who may be affected by LEIP activities and others with different interests.

Depending on their level of interest or the magnitude of impacts on different stakeholders, two categories of stakeholders have been identified as follows:

* **Primary stakeholders**: thus stakeholders that are directly affected, either positively or negatively, by the project, decisions, or actions.
* **Secondary stakeholders**: those that are indirectly affected by the project, or decision, or actions

The table below presents primary and secondary stakeholders currently relevant to LEIP.

T**able 3: Identification of Primary and Secondary Stakeholders for each component of the project of LEIP**

|  |  |
| --- | --- |
| **Component 1: Improving quality of teaching and learning in primary education** | |
| **Primary Stakeholders** | **Secondary Stakeholders** |
| Local Communities | Community Based organisations |
| Vulnerable or disadvantage groups | Private Sector |
| School management and administration | Public Sector |
| Learners/ Students | Media |
| Teaching and Non-Teaching Staff | NGOs |
| Parents/Guardians | Academia/Research Institutions |
| General Public | Development Partners |
| **Component 2**: **Enhance physical learning environment and conditions in primary and secondary schools** | |
| Primary Stakeholders | Secondary Stakeholders |
| Local Communities | Community Based organisations |
| Vulnerable or disadvantage groups | Private Sector |
| School management and administration | Public Sector |
| Learners/ Students | Media |
| Teaching and Non-Teaching Staff | NGOs |
| Parents/Guardians | Academia/Research Institutions |
| General Public | Development Partners |
| **Component 3: Strengthen project management, technical assistance, and governance of education system** | |
| Primary Stakeholders | Secondary Stakeholders |
| Public Sector | Media |
| Development Partners | Academia and Research Institutions |

## 5.1. Classification of Stakeholders based on ESS10.

The stakeholders categories identified in Table 3 above may be further classify them into three main groups:

* 1. Those that have a role in the project implementation (also known as ‘implementing agencies’) and they consist mainly government agencies (ministries and local administrative entities)
  2. Those that are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’) and in these groups are found mostly in local communities, vulnerable groups and users of the project area, for example: land users (farmer, herd boys) children of the school, attendees to churches and health centres, users of roads, farmers, traditional healers, etc.
  3. And those that 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: in this group are found civil society organization, opinion leaders in the project area, the media, other government agencies, the private sector in general among others.

In reference to the above description, stakeholders under LEIP will emerge from the following entities:

(i**) Public Sector and Development Agencies**

Engaging with public sector, institutions, development agencies, authorities, and departments will serve two main purposes: Firstly, is to build consensus and ownership, and secondly is to identify the governance framework for socio-economic development and environmental management.

Identified ministries and agencies or authorities during planning are presented in table 4 with their roles and responsibilities.

**(ii) Local communities**

Involvement of local communities at earlier stage of LEIP will help to prevent or mitigate early on problems/complaints that may arise and hinder project progress in the next phases; and beside that, community participation is a basic human right and fundamental principle for development projects. During LEIP implementation, especially in construction phase, project components especially of new schools will require land acquisition with no involuntary resettlement of residents living in the project area. There will be a need to communicate with owners of land, crops and properties for which project activities will require acquisition to agree on fair compensation of the loss caused by the project.

The extent and magnitude of impacts that would be caused by LEIP activities is not known at preparation stage nor individuals to be affected or displaced, but later during environmental and social assessment studies, especially Environmental Impact Assessment (ESIA), the Ministry of Education and Training will be responsible of analyzing project impact and identification of mitigations measures to be undertaken as well as preparing a consultation plan to communicate to the community about project impacts and national legal obligation related to expropriation in the public interest.

**(iii) Vulnerable or disadvantage groups**

Vulnerable/disadvantages groups are community members likely to be affected by LEIP but may have difficulty in engaging with the stakeholder consultation process and thus may not be able to fully express their concerns regarding the proposed Project. Vulnerable groups could be for example: Poor women headed households, people with physical or mental disabilities, small scale farmers using the both the rangelands and arable land, small scale traders using roadsides to sell their products among others.

**(iv) Non – government Organization (NGOs)**

Non-governmental organizations in the project area include youth groups, women gender-based advocacy group, human rights activists, faith-based organizations, NGOs operating in the project area mostly those focusing on issues of environment and social interventions etc. They have influence on the project especially when it comes to advocate for vulnerable groups and environment protection. These organizations will be consulted at district level during project identification, initiation/planning phases and their concerns and considered. Consultations with them will continue for the entire project lifecycle in order to update them on changes or any emerging issue that may arise during the course of project.

**(v) Private Sector**

Although the project advocates for community-based approach for construction of both additional classrooms in targeted primary schools and laboratories in secondary schools it worth mentioned that the project will however require the skills and knowledge of qualified construction engineers and professional organizations to achieve its objective. The required safeguard documents such as ESIA will be carried out by MoET while the construction of infrastructures like construction of additional classrooms, new schools and laboratories will involve the use of community with the support of highly recognized and experience construction engineers in infrastructures development. All these stakeholders will be identified and consulted in due time according to the project implementation timelines.

**(vi) World Bank and other development partners**

The additional classrooms, laboratories, and new schools’ infrastructures to be developed under LEIP will be funded through World Bank Investment Project Financing mechanism which allows developing countries to borrow money in terms of loan or bank guarantees from World Bank. The Bank will monitor and ensure efficient use and value for money. Moreover, WB is also committed to supporting and enhancing the capacity of national environmental and social frameworks to assess and manage the environmental and social risks.

**(vii) Media**

The media including newspapers, magazines, other printed media, televisions, local radio stations, community radios, and electronic media will be used to disseminate information on LEIP activities and progress. It will also be used as a channel to communicate with stakeholders and a platform where stakeholders can express their concerns and issues as regards LEIP.

Table 4 below summarizes project stakeholders and how they are affected by the project, their roles, responsibility, and interests of each stakeholder identified during planning as far as their mandate and mission, involvement, resources and influence in project development, planning and decision making are concerned.

The identification process will continue throughout the implementation as the engagement of stakeholders during all phases of the project life cycle is paramount. Hence, new stakeholders will be identified while others will lose their relevance as the project goes forward.

**Table 4: Identified stakeholders for LEIP and potential interest or influence in the project (this is just an indication and not a proper assessment of each group**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **No** | **Stakeholder** | **Involvement in the project** | **Interest** | **Influence** |
| **Public Sector** | | | | |
| 1. | Ministry of Education and Training | Their main role will be:   * To carryout ESMF, RPF, ESIA and RAP studies. * Represent the client (MoET) and serve as link between MoET and District and local community during impact assessment. * Carryout construction activities, supervision and implementation of project activities * Supply materials required for construction of roads and drainages infrastructure | High | High |
| 2. | Ministry of Environment and Culture | -The Ministry of Environment and Culture main responsibility will be coordination, monitoring and supervision of environmental conservation activities.  -The Ministry will ensure that all the project activities are adhered to country and international policies on Environment and Social Management Framewok  -It also has a cross-sectoral mandate to oversee the conduct of EIAs through issuance of guidelines, regulations and registration of practitioners. It reviews and approves environmental impact statements in consultation with any relevant lead agencies. | High | High |
| 3. | Ministry of Local Government and Chieftainship Affairs, Home Affairs and Police (District Administration (DA), District Council Secretary (DCS) and Local Councils task force | The ministry will be engaged in coordinating project activities at local government level.  The Ministry is also a custodian of Law Enforcement through department of Police. They will directly participate in: -   * Land allocation for construction of new schools. * Enforce the law on issues related to gender-based violence, sexual abuse and exploitation and other crimes related to LEIP implementation. * Education and Information dissemination on LEIP E and S potential environment and social impacts as well as mitigation measures * Monitoring and overseeing LEIP implementation to ensure that all project activities adhere to the Environment and Social Management Framework guidelines. * Reporting implantation progress. | High | Low |
| 4. | Ministry of Gender and Sports | Their role will be to advocate and ensure gender related issues such as gender-based violence, Sexual Exploitation and Abuse, discrimination against gender are taken into consideration during LEIP implementation. | High | High |
| 5. | Ministry of Health | The Ministry will ensure that that project activities, equipment, and infrastructure hardly expose the community adverse environmental and social risks and impacts. The rationale being to.   * To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and nonroutine circumstances. * To avoid or minimize community exposure to project-related diseases and hazardous materials. * To have in place effective measures to address emergency events. * To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities. | High | High |
| 6. | Ministry Labour and Employment | The ministry will ensure that LEIP promote sound worker-management relationships and enhance the development benefits by treating workers in the project fairly and providing safe and healthy working conditions.   * To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. * To prevent the use of all forms of forced labor and child labor. * To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. * To provide project workers with accessible means to raise workplace concerns | High | High |
| 7. | Ministry of Social Development | The ministry will advocate and protect all the project beneficiaries including vulnerable people such as women, persons with disabilities and children against discrimination during the project implementation | High | High |
| 8. | Ministry of Finance and Development Planning | The Ministry of Finance and Economic Planning co-ordinates functions of finance and planning and development cooperation.  They will lead financial negotiation with World Bank and on project timelines, starting and closure.  They will also be responsible for disbursing the funds according to agreed project priorities. | High | High |
| **Development Partners** | | | | |
|  | World Bank | The LEIP project will be funded through World Bank Investment Project Financing mechanism which allows developing country to borrow money in terms of loan or bank guarantees from World Bank. The Bank therefore monitors and ensures efficiency and value for money.  Moreover, WB is also committed to supporting and enhancing the capacity of national environmental and social frameworks to assess and manage the environmental and social risks.  WB will carry out regular sites monitoring so as to ascertain if activities on ground conform with Environment and Social Commitments plan as well as agreement signed with Government of the Kingdom of Lesotho. | High | High |
| **Media** | | | | |
|  | Radio, Newspapers and social media | The media including newspapers, magazines, other printed media, televisions, local radio stations, community radios, and electronic media will be used to communicate about LEIP activities and progress.  Media will be a useful link to reach out to stakeholders especially during disclosure of project impact identification.  It will also be used as a channel where stakeholders communicate their interests, complaints and grieve | High | Low |
| **Private Sector** | | | | |
|  | Business Community | Business owners and service providers will be involved in the project’s wider supply chain or may be considered for the role of project’s suppliers in the future. All these stakeholders will be identified and consulted in due time according to the project implementation timelines | High | Low |
| **Community Based organisations/Non-Governmental Organisations** | | | | |
|  | Local Councils | The local community is interested because of the following;  1) The community members (Some) will be negatively impacted by the project as a result of land acquisition (loss of arable and rangelands),  2) The community will benefit also positively from this project through improved education accessibility and school infrastructure.  3)Local communities will be useful agents in collection of data that will be vital in monitoring and as such they will play a role in the monitoring framework | High | High |
|  | Community Based Organisations (CBOs) | Involvement of local CBOs at earlier stage of LEIP project will help to prevent or mitigate early problems/complaints that may arise and hinder project progress in the next phases; and bedside that, community participation is a basic human right and fundamental principle for transparency and ownership. | High | High |
|  | NGOs, Faith Based Organizations | These are of advocates groups for protection and preservation of environment, legal practitioners, representatives of youth and gender equity promoters. Their responsibility will be among others to:   * Provide useful information on project impact during Environment and Social Impact Assessment * Their participation and engagement will help Project Implementation Units to channel information relevant to the project. | High | Low |
|  | Vulnerable and disadvantaged group | These will include physically disabled people, widows or women headed households, children or orphans headed households, households below the poverty line. Their roles during LEIP implementation will include:  Provide information regarding social economic status of residents around the project area. The information will serve as a baseline in evaluating project impact on people’s life. | High | High |
| **Academia** | | | | |
|  | Research Institutions, Tertiary Institutions etc | The Academia and Research Institutions concerns is mainly on the following;   * Potential concerns regarding environmental and social impacts * Potential educational/outreach opportunities to increase awareness and acceptance of the project | Low | Low |
| **School Management and Administration** | | | | |
|  | School Management Committees (SMCs), Boards of Governors (BoGs), Parents Teachers Associations (PTAs) and Head teacher | The school management will play a role in overseeing the project implementation within the school premises and compass, ensuring effective management of project resources and materials and also ensuring that the project activities are implemented within the specified project time frame. are adhered to.  The project will also engage them in mobilizing parents to support and strengthen school activities with specific to construction of both reception classes and new school construction | High | High |
|  | Parents /Guardians | The parents will form part the community based project implementation and therefore implementation of project will require direct support from parents | High | High |
|  | General Public | Their interest will be mostly on the general socioeconomic impacts of the project, both adverse and beneficial. Their main role will to participate and support the implementation of the project activities within the time frame.  The project will however ensure that general public in the project area are kept informed and updated on the latest project progress, adjustments, challenges and anticipated solutions. | High | High |
|  | Learners/ Students | These are the direct beneficiaries of the project interventions and their role will be to participate and support their implementation of the project under the guidance both the parents, teachers and non-teachers. | High | High |
|  | Teaching and Non-Teaching Staff | To archive the intended outcome of the project, teachers are key stakeholders in ensuring strict adherence of the set project activities as well as creating awareness for learners and other stakeholders on proper utilization and management of the project resources and materials | High | High |

# 6.0. Stakeholders Engagement Methodological Approach /Strategy/Principles

**Summary of stakeholder engagement during project preparation and implementation**

The purpose of the present Stakeholder Engagement Plan is, among others, to provide information on how Stakeholder Engagement will be practiced throughout the course of the project and which methods will be used as part of the process; as well as to outline the responsibilities of the Ministry of Education and Training (MoET). While the project is not expected to cause any serious or substantial environmental and/or social risks, the Project will apply the World Bank’s Environmental and Social Framework (ESF), and as such, will particularly ensure that requirements of ESS10 on Stakeholder Engagement are followed throughout the project implementation.

As part of stakeholder engagement in preparing this project, the MoET will work closely with the Local Education Group and other relevant ministries and agencies in Lesotho. The Local Education Group is comprised of key role players in the Education Sector in Lesotho, and MoET will have to therefore work closely with them to improves outcomes of the Lesotho Education Improvement Project (LEIP).

The MoET will engage in ongoing dialogue with all stakeholders within the Local Education Group, as well as in coordination with each other. The ministry will inform the main stakeholders on the Project design, indicated its openness for feedback on the Project design, and inform them on the applicability of the WB’s ESF to LEIP. MoET will also stress the importance of stakeholder engagement with primary beneficiaries of the project – boys and girls (and their parents, legal guardians, etc.) attending junior secondary education in target project areas (communities with low poverty rate and low school retention rate).

The initial, remote consultations will resume in February 2024, and its main purpose will be to introduce the project and gather stakeholders’ views and perceptions on the proposed project. The Project will conduct more in-depth stakeholder engagement before appraisal of the Project (by April 2024), and will continue to do so throughout Project implementation.

**Principles of Stakeholders Engagement**

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

An effective stakeholder engagement depends on mutual trust, respect and transparent communication between the MoET and its stakeholders. Therefore, the implementation of the plan is crucial for the success of the project and for the sustainability of investments in the long term. It will thereby improve decision-making and performance by:

* **Ensuring Understanding:** An open, inclusive and transparent process of engagement and communication will be undertaken by the LEIP to ensure that stakeholders are well informed about the proposed development. Information will be disclosed as early and as comprehensively as possible.
* **Involving Stakeholders in the Assessment**: Stakeholders will be included in the scoping of issues, the assessment of impacts, and management/mitigation measures defined in the draft ESIA report. They will also play an important role in providing local knowledge and information for the social baseline and informing the social impact assessment.
* **Building Relationships:** Through supporting open dialogue, engagement will help to establish and maintain a productive relationship between the project team and stakeholders. This will support not only an effective ESIA, but also will strengthen the future relationships between the project and stakeholders.
* **Managing Stakeholders Expectations:** It is important to ensure that the proposed Project does not create, or allow, unrealistic expectations to develop amongst stakeholders about potential Project benefits. The engagement process will serve as a mechanism for understanding and managing stakeholder and community expectations, by disseminating accurate information in an easily understandable manner.
* **Ensuring Compliance:** The process is designed to ensure compliance with both local regulatory requirements and international best practice.
* **Managing risk** - stakeholder engagement helps the MoET, project and communities to identify, prevent, and mitigate environmental and social risks and their impacts that can threaten project viability;
* **Avoiding conflict** - understanding current and potential issues such as land rights and proposed project activities;
* **Improving national policy** - obtaining perceptions about a project, which can act as a catalyst for changes and improvements in national policies formulation;
* **Identifying, monitoring and reporting on** **impacts** - understanding a project’s impact on stakeholders, evaluating and reporting back on mechanisms to address these impacts; and

This (SEP) shall be informed by a set of principles defining its core values underpinning interactions with identified stakeholders. Common principles based on “International Best Practice” include the following:

* **Commitment** is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process,
* **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust,
* **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognized,
* **Transparency** is demonstrated when community concerns are responded to in a timely, open, and effective manner,
* **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
* **Trust** is achieved through open and meaningful dialogue that respects and upholds a community’s beliefs, values and opinions.

# 7.0. Stakeholder Engagement Program

## 7.1.Purpose and Timing of Stakeholder Engagement

The main goal of the Stakeholder engagement plan is primarily to garner all support of the education sector. This support will allow for ease of implementation as it is assumed that mobilization of these stakeholders will provide an enabling environment for implementation of activities that will include amongst many others, training and procurement of teaching and learning materials. The ongoing sharing of information will be aligned with ongoing meetings that already exist. Examples of such meetings include Local Education Group *ad-hoc* meetings at the central level as well as the ongoing school level board meetings. In addition to these outlined meetings, it is worth mentioning that there will be progress updates on implementation of project activities at different levels. These updates will be provided by the different implementers of project activities. Documentation of these meetings will form part of project documentation. In a nutshell the purpose and goals of the stakeholder engagement program are summarized below.

1. Adding value to project activities.
2. Ensuring accessibility of information, by all stakeholders, to inform sense making processes.
3. Encouraging adherence to values of transparency, trust, equity, and fairness.
4. Promoting responsiveness to identified needs and the highest ethical standards and respects for differing priorities and values.
5. Ensuring local ownership, including ethnic minority communities, and the creation of outputs that are relevant and of benefit to communities and organizations.
6. Including different types of stakeholder groups in participation processes and benefit distribution, including but not limited to engagement, capacity building, employment, skills transfer, sharing of knowledge and the increase of cultural awareness.
7. Developing mechanisms to manage conflicts in the public interest.
8. Being flexible to adapt to changing circumstances.
9. Fostering well-coordinated and planned implementation.
10. Generating, and responding to, feedback.

## 7.2. Stakeholders Engagement Procedure

When selecting an appropriate consultation technique, culturally appropriate consultation methods and the purpose for engaging with a stakeholder group will be considered. Prior to any engagement event the following steps will be followed;

1. Preparation of standard ‘question and answer’ sheets tailored for specific stakeholder types (based on ‘lessons learnt’ analysis and common issues raised in previous engagement
2. Planning/design of engagement action (s) with Project Implementation Units, consultants and then key stakeholders at National, District and Local Level.
3. Agree on the roles of parties during stakeholder engagement activities;
4. Selection of individual/group stakeholders with whom engagement will occur;
5. Selection of methods for engaging and disclosure of information (including such topics as format, language, and timing);
6. Selection of location and timing for engagement activities, for PAPs, avoiding busy work times when special activities may be occurring);
7. Agreeing mechanisms for ensuring stakeholder attendance at engagement activities (s) (if required);
8. Identification and implementation of feedback mechanisms to be employed.

In addition to these outlined meetings, it is worth mentioning that there will be progress updates on implementation of project activities at different levels. These updates will be provided by the different implementers of project activities. Documentation of these meetings will form part of project documentation.

When the above-mentioned preparatory steps are completed, there are engagement methods and techniques that will be used. Some of these techniques are illustrated on the table below;

**Table 5: Illustrating engagement methods and techniques to facilitate the processes of information provision, information feedback as well as participation and consultation.**

|  |  |
| --- | --- |
| **Engagement Methods** | **Appropriate Application Methods** |
| Correspondences (Phone, Emails, text messages) | * Distribute information to Government officials in ministries and agencies, Local Governments, NGOs, and private sector/professional, organizations, * Invite stakeholders to meetings and follow-up |
| One-on-one meetings | * Seeking views and opinions; * Enable stakeholder to speak freely about sensitive issues; * Build personal relationships |
| Focus Groups Meetings | * Present project information to a group of stakeholders; * Allow stakeholders to provide their views on targeted baseline information; * Build relationships with communities; * Record response |
| Formal Meetings | * Present the Project information to a group of stakeholders; * Allow groups to comment – opinions and views; Build impersonal relation with high level stakeholders; * Disseminate technical information; * Record discussion |
| Print media and radio announcements | * Disseminate project information to large audiences, and illiterate stakeholders; * Inform stakeholders about consultation meetings; |
| Internet media | * Facebook page, what’s up groups, tweeter handle among others |
| Workshops and SIMINARS | * Present project information to a group of stakeholders; * Allow the group of stakeholders to provide their views and opinions; * Use participatory exercises to facilitate group discussions, brainstorm issues, analyze information, and develop recommendations and strategies; |
| Public Consultations | * Present Project information to a large group of stakeholders, especially communities; * Allow the group to provide their views and opinions; * Build relationship with the communities, especially those impacted and vulnerable/disadvantaged; * Distribute non-technical information; * Facilitate meetings with presentations, PowerPoint, posters etc.; * Record discussions, comments, question |

Following identification of stakeholders and their involvement in the project as well as the engagement methods, the table 6 below presents consultation levels and technics that will be used in communicating with stakeholders.

**Table 6 demonstrating stakeholders consultation levels and technics that will be used in communicating with stakeholders.**

|  |  |
| --- | --- |
| Public Sector | * Phone / email / text messaging * One-on-one meetings * Formal meetings |
| Community Based | * Print media, text messaging and radio/TV announcements * One-on-one interviews/meetings * Public meetings * Focus group meetings * Surveys * Information boards |
| Private Sector | * Phone /email / text messaging * Print media and radio announcements * Workshops * Focus group meetings * Survey |
| Media | * Phone / email / text messaging * One-on one interviews |
| Academia | * Phone /email / text messaging * One-on-one interviews |
| NGOs | * Phone /email / text messaging * One-on-one interviews * Focus group meetings * Information board |
| World Bank and other development partners | * Phone / email / text messaging * Formal meetings * Workshops |
| School governing bodies i.e. SMC/BoG, PTA and Headteachers | * Formal meetings * Print media, text messaging and radio/TV announcements * Circular letters and official letters * Internet media- (Google Meet, Zoom, Microsoft Team, Blue Jeans, Skype) meeting |
| Parents /Guardians | * Print media, text messaging and radio/TV announcements * One-on-one interviews/meetings * Public meetings (in line with Sop’s) * Focus group meetings. * Surveys * Information boards * Information leaflets, posters, flyers, and brochures |
| Learners/ Students | * Print media and radio/TV announcements Information leaflets, posters, flyers, and brochures; * Workshops (Following Sop’s) * Formal meetings (Following Sop’s) * One-on-one interviews/meetings * Surveys * Focus group meetings |
| Teachers/ Non-Teachers Associations | * Print media, text messaging and radio/TV announcements * Formal meetings * One-on-one meetings * Official letter |
| Disadvantages and Vulnerable Groups | * Print media * Radio/TV announcements * Information leaflets, posters, flyers, and brochures. * Workshops (Following Sop’s) * Formal meetings (Following Sop’s) * One-on-one interviews/meetings * Surveys * Focus group meetings. * Information resource centre |
| Electronic and print media; associated interest groups and the general public | * Print media, text messaging and radio/TV announcements * Phone / fax / email / text messaging * One-on-one interviews * Formal meetings (Following Sop’s) Website/Webmail Official letters |

**Stakeholder Engagement Approach**

To achieve the above, the project will hold preparatory consultations with different stakeholders (local communities, NGOs, school management, general public among others. The main objective of these preparatory consultations will be to:

1. To garner all support of the education sector.
2. To identify the main stakeholders related to the project, their interest and views toward LEIP.
3. Identify potential impacts that the project could cause to the local users.
4. Advise on the technical design of the project and implementation of the project components.
5. To collect lessons learned from previous MoET projects similar to LEIP.

Those consultations meetings will gathered together stakeholders at ministerial level and local level, or district governments, and provided them with an opportunity to suggest their priorities in terms of project implementation and to raise their concerns among others. Furthermore, going forward stakeholder’s engagement will assist with ensuring that all relevant issues are captured and that all stakeholders are offered a platform to voice their concerns. In order to do so, there are a variety of engagement techniques that will be implemented under LEIP to build relationships with stakeholders, gather information from, consult with, engage, and disseminate project information to stakeholders.

## Stakeholders Information Disclosure

The project will ensure that the different activities for stakeholder engagement are inclusive and culturally sensitive. This will include household-outreach and focus group discussions on addition to village consultations, the use of different languages, verbal communication or pictures instead of text, etc. In specific cases, it will be important to consider whether the risk level would justify avoiding public/face-to-face meetings and whether other available channels of communication to reach out to all key stakeholders should be considered (including social media, for example). Measures will also be taken to ensure that the vulnerable groups outlined above will have meaningful opportunities to participate in and benefit from project activities.

The final draft of the Stakeholder Engagement Plan (SEP) will be re-disclosed on the projects website and shared with all the targeted institutions in the districts and the entire country. The SEP will be disclosed and publicly accessible throughout project implementation period. The electronic copies of the project document including ESMF/ESMPs, LMP, Gender/GBV Action Plan, will be placed on the project website. This will allow stakeholders with access to the Internet to view information about the planned development and to initiate their involvement in the public consultation process. LEIP will use various methods of engagement that will be used by the implementing agencies as part of their continuous interaction with the stakeholders. The method of engagement will be constantly reviewed. Distributions of the disclosure materials will be made available at venues and locations frequented by the primary beneficiaries and places to which the public have unhindered access.

The SEP will be disclosed both on MoET websites and re-disclosed as needed with necessary updates before appraisal. Meaningful stakeholder engagement will be particularly important in the context of Component 2, which among others, supports construction of reception classes and three new secondary. Moreover, the project will finance community mobilization activities that will involve consultations, communication campaign and outreach activities, with the goal to role of School Based Management Committees in holding schools accountable to ensure that beneficiaries stay in school as well as strengthen the school-community relationship to improve student retention.

Free printed copies of the ESMF/ESMPs and the SEP (along with the other E&S documents) in Englis

h and executive summary of these documents will be made accessible to the general public at the following locations:

* MoET/PFU Office
* MoET District Offices
* Schools Management and Administration Offices
* Local Government Offices
* Other designated public locations to ensure wide dissemination of the materials.

In ensuring the participation of vulnerable individuals and groups in project, the project will design tailor made suitable implementation techniques to facilitate smooth consultations. The vulnerable groups identified by the project include the rural population, orphan and vulnerable children, people living with disabilities and women. Attention will be given to the vulnerable groups to ensure that they are not denied project benefits. This will be done by focus group discussions, monitoring participation rates, undertaking beneficiary assessments/feedback, using online platforms to allow access to otherwise disadvantaged groups, and ensuring that at least 30% of participant are females.

The methods for stakeholders’ information disclosure will include the following;

* Public/community meetings
* Separate meetings for women and vulnerable
* Face-to-face meetings
* Focus Group Discussions/Key Informant Interviews
* Workshop with the Experts
* Surveys, polls, etc.
* Interviewing stakeholders and relevant organizations
* Joint assessments
* Mass/social media communication (as needed)

## 7.3. The Proposed strategy for consultations

The Education Sector has a range of stakeholder groups as earlier identified. These include members of the Local Education Group, School Proprietor Representatives (churches, government, and communities), School boards which will in turn have access to the communities and community level governance structures as a result of their composition, District Education Officials, Ministry Officials and the general public. The Ministry of Education Information Office will be responsible for coordination of all these events and will keep a schedule of implementation of all outreach activities and report on progress.

These groups will be engaged by use of different platforms including:

* Interviews
* Surveys, polls, and questionnaires for beneficiary feedback
* Public meetings, workshops, and/or focus groups on specific topic.
* Participatory methods
* Other traditional mechanisms for consultation and decision making.

### 7.3.1. Stakeholders Engagement Activities

Stakeholder engagement activities will be informed by and regularly updated based on process of stakeholder identification, analysis and mapping as well as on comments received on the stakeholder engagement process. Prior to commencement of stakeholders’ engagement, the level, technique/method of engagement and the activity to be carried out will be clearly identified by MoET/PFU before communicating to stakeholders. The key project life-cycle phases and associated activities to be considered when implementing stakeholders’ engagement include the following but not limited:

1. Project Identification Phase
2. Project Preparation phase
3. Development of project safeguard instruments
4. Project Design phase
5. Project Implementation and monitoring
6. Project Evaluation and Closure

The Project will carry out stakeholder engagement for (i) consultations with stakeholders throughout the entire project cycle to inform them about the project, including their concerns, suggestions and other feedback, and complaints. The techniques to be used during LEIP preparation and which might be expanded to other methods during the entire project cycle, are presented in table 8 below.

**Table 8: Stakeholders levels of consultation**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Project Stage** | **Estimated Date/Time Period** | **Topic of Consultation/ Message** | **Method Used** | **Target Stakeholders** | **Responsibilities** |
| Project Identification | *30th September 2023* | Preparation of Project Concept Note/Country Partnership Framework on Borrower main priorities,  Identification of project proposed project objectives,  Identification of risks to these objectives,  Intended achievements and alternative scenarios.  and finally, the timeframe for the project preparation process. | Phone / email / text messaging.  Formal meetings  Workshops | World Bank, MoET | MoET/PFU |
| Project Preparation | *09th February/2023* | Preparation of Environment and Social Assessment  Preparation of Stakeholders Engagement Plan with Grievance Redress Mechanisms and Labour Management Procedures  Preparation of Environment and Social Commitment Plan  Beneficiaries and stakeholders consultations.  Preparation of Stakeholders Engagement  Preparation of Environmental and Social Action Plan | Phone / email / text messaging  Formal meetings  Workshops  Survey  Consultations  One on one meetings | MoET  World Bank  Ministry of Finance and Economic Planning  Ministry of Local Government and Chieftainship Affairs  CBOs  NGOs | MoET/PFU |
| Project Approval/Appraisal | *30th April 2024* | Review of the project design in detail and resolve any outstanding questions.  Review of the work done during the identification and preparation phases  Confirmation of the expected project outcomes, intended beneficiaries, application of ESF requirements (for IPF) and evaluation tools for monitoring progress. | Phone / email / text messaging  Formal meetings  Consultations | MoET  World Bank  Ministry of Finance and Economic Planning | MoET  World Bank  Ministry of Finance and Economic Planning |
| Project Negotiation/Approval | *30th June 2024* | Negotiation, Acceptance and finalization of the project details  Finalization of the **Project Appraisal Document**, along with other financial and legal documents, for submission to the Bank for consideration and approval | Phone / email / text messaging  Formal meetings  Consultations | MoET  World Bank  Ministry of Finance and Economic Planning | MoET  World Bank  Ministry of Finance and Economic Planning |
| Project Implementation and Supervision | *01st September 2024* | Preparation for the specifications for the project  Preparation for procurement of goods, works and services needed,  Preparation for environmental and social impact mitigation set out in agreed plans, including those described in the Environmental and Social Commitment Plan (ESCP). | Phone / email / text messaging  Formal meetings  Workshops  Letters  Consultations | All Project affected persons including.  MoET  World Bank  Ministry of Finance and Economic Planning  Ministry of Local Government and Chieftainship Affairs  CBOs  NGOs  Media, Development Partners,  National and international NGOs  District local governments  School governing bodies | MoET  Ministry of Local Government and Chieftainship Affairs  CBOs  NGOs |
| Complition, Validation and Evaluation | *31st July 2028* | Evaluation of the project’s outcomes; challenges, and lessons learned to determine additional measures needed to sustain the benefits derived from the project.  Project exit strategy  Compilation Project **Implementation Completion and Results Report,**  Dissemination of final project reports. | Phone / email  Formal meetings  Workshops  One on one meetings  Virtual and In-person review meetings.  information leaflets, posters and brochures  Consultations  Survey  social media.  Electronic publications and press releases on the MoES websites.  Press releases in the local media (both print and electronic media | All Project affected persons including.  MoET  World Bank  Ministry of Finance and Economic Planning  Ministry of Local Government and Chieftainship Affairs  CBOs  NGOs  Media, Development Partners,  National and international NGOs  District local governments  School governing bodies | MoET  World Bank |

# 8.0. 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, and on the project’s overall implementation progress.

# 9.0. Resources and Responsibilities for implementing stakeholder engagement activities.

## 9.1. Resources

MoET will be responsible for and take charge of stakeholder engagement activities, including by providing adequate human and technical resources for undertaking stakeholder engagement in particular in relation to accessibility, cultural sensitivity and technical considerations of members of vulnerable groups. The cost of the stakeholder engagement activities will be benchmarked with those undertaken in both “Lesotho Education Quality for Equality Project” and “Lesotho Basic Education Improvement Project” in terms of cost estimation. This rationale therefore brings an estimated cost of about US $ 187,000.00 which will be allocated from the overall project allotment. Other resources to be committed will organized as such:

* The MoET Information Office will be in charge of the SEP in liaison with the project development team lead by the department of planning.
* The MoET will be committed to the implementation of the project as well as the implementation of the SEP in keeping with requirements and good governance pillars therefore makes a commitment to commit some of the project funds towards the implementation of the SEP activities.
* Additional information on SEP related activities will be available from the Information office with support from the department of planning at the Ministry of Education and Training. The physical Offices are at Ministry of Education and Training, Off Constitution Road, Maseru. The telephonic inquiries can be made at (+266) 22214400.

# 10.0. Management and Responsibilities

The Stakeholder Engagement activities will form part of the Environmental and Social Commitment Plan (ESCP). The implementation arrangement for the project will be done at several levels at National, District and School. At national level, the daily implementation of the SEP will be coordinated by the Project Coordinating Unit (PCU) in collaboration with MoET. The Project Environmental and Social Specialists within the PCU will provide support and coordinate the management of the environmental, social, and health and safety risks and impacts posed by the project at central level. The specialists will directly oversee the implementation of SEP and thus compile periodic progress reports for the interested stakeholders. The specialists will also support training and capacity building of relevant stakeholders on the SEP. Overall management responsibility for implementing the SEP will rest with the PFU for MoET. The Project Coordinator will oversee the SEP implementation to ensure success of the LEIP project.

# 11.0. Monitoring and Evaluation Responsibilities

The PFU safeguard team working with other stakeholders from relevant Government Agencies and the District Local Governments will undertake monitoring of the SEP during project implementation to evaluate the impacts and the mitigation measures to address these impacts. The monitoring will be undertaken at the beneficiary schools, through preparation of monthly monitoring reports that will feed into the Project Coordination on monthly and annual progress reports to be submitted to the Management of the Ministry and the Bank.

# 12.0. Training

All the LEIP partners and PFU team will attend a workshop that will bring awareness on the project, SEP, GRM as well as other project specific documents.

# 13.0. Budget

The Project Coordinator will ensure that the PFU has an adequate standing budget allocated towards the Stakeholder Management Programme. The budget for the SEP is USD187.000.00 and will be included in component 3 of the project.

**An example of a budget table is included below**:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Budget Category** | **Quantity** | **Unit Costs** | **Times/Years** | **Total Costs** |  |
| **1. Estimated staff salaries\* and related expenses** | | | |  |  |
| 1a. [E.g., communications consultantes] |  |  |  |  |  |
| 1b. [E.g., travel costs for staff] |  |  |  |  |  |
| 1c. [E.g., estimated salaries for Community Liaison Officers] |  |  |  |  |  |
| **2. Events** |  |  |  |  |  |
| 2.1. Public Consultations and Workshops |  |  |  | $10,000.00 |  |
| **3. Communication campaigns** |  |  |  |  |  |
| 3.1. Development of Communication materials (leaflets, posters, press releases |  |  |  | $10,000.00 |  |
| 3.2. Printing of Communication materials (leaflets, posters,) |  |  |  | $10,000.00 |  |
| 3.3. Dissemination of Communication materials (Stakeholder Engagement, |  |  |  | $10,000.00 |  |
| 3.4. procurement of Project hotline to receive complaint and grievance related to the project |  |  |  | $10,000.00 |  |
| 3.5. Broadcast communication Materials and airing of Radios and TV programmes |  |  |  | $20,000.00 |  |
| Project press conferences |  |  |  | $20000.00 |  |
| **4. Trainings** |  |  |  |  |  |
| 4.1. Training on social/environmental issues for PFU and contractor staff |  |  |  | $30,000.00 |  |
| 4b. Training on gender-based violence (GBV) for Project Implementing Unit (PIU) and contractor staff] |  |  |  | $10,000.00 |  |
| **5. Beneficiary surveys** |  |  |  |  |  |
| 5.1 mid-project perception survey] |  |  |  | ***$20,000.00*** |  |
| 5.2, end-of-project perception survey] |  |  |  | ***$30,000.00*** |  |
| **6. Grievance Mechanism** |  |  |  |  |  |
| 6.1. training of GM committees |  |  |  | ***$20,000.00*** |  |
| 6.2 suggestion boxes in villages |  |  |  | ***$2,000.00*** |  |
| 6.3. GM communication materials |  |  |  | $5000.00 |  |
| **7. Other expenses** |  |  |  |  |  |
| 7a. |  |  |  |  |  |
| **TOTAL STAKEHOLDER ENGAGEMENT BUDGET:** | | | | $187,000.00 |  |

# 14.0. Grievance Mechanism and Redress

## 14.1. Overview of Grievance Mechanism and Redress

Grievance Redress Mechanism (GRM) describes routes through which the affected persons present their complaints against the project during pre-construction, construction and operation phases. It is a process for receiving, evaluating, and addressing project-related complaints from citizens and affected communities at the level of the project. It is also a mechanism that allows for the identification and resolution of issues affecting the project.

The goal of the GRM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. By increasing transparency and accountability, GRM aims to reduce the risk of the project accidentally affected citizens/beneficiaries and serves as important feedback and learning mechanism that can help reduce project negative impact and increase the project positive impacts. The mechanism focuses not only on receiving and recording complaints but also on resolving them hence why LEIP adopted this process to curb some of risks and impacts that emanate as a result of the project implementation.

The GRM will be popularized such that every project aggrieved person has access to the mechanism. The LEIP approach to manage grievances involves formation of Grievance Management Committees (GMCs) at community, sub-county and district level.

The GRM procedures will be improved further by appraisal (April 2024) to include special guidelines to handle GBV-sexual harassment related complaints and grievances, taking into account their sensitivity. Procedures that will handle GBV-related issues will be based on the following key guiding principles that must be systematically applied to adequately respond to the specific nature of SEA/SH cases: confidentiality, survivor-centricity, and survivor safety.

Some examples of possible complaints may include.

1. Discrimination from access to project materials.
2. Sexual exploitation and abuse (SEA).
3. Matters relating to the recruitment, appointment, or contract of workers implementing project activities.
4. Health and safety risks
5. Violation of human rights,
6. Gender based violence (GBV).
7. Negative impacts on the environment such as pollution of water ways, soil, and air; and among others.

It is critical that stakeholders understand that all grievances lodged, regardless of the project phase or activity being implemented, will follow one single mechanism. The mechanism must not impede access to other judicial or administrative remedies.

## 14.2. Objectives of Grievance Redress Mechanism (GRM)

The main objective of a GRM 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 GRM:

* Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects.
* Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
* Avoids the need to resort to judicial proceedings.
* Verify that complainants are satisfied with outcomes of corrective actions.

## 14.3. Grievance Redress Process

In order to resolve all grievances effectively, two GRMs will be established under the LEIP Project; the community GRM as provided for under ESS10 and the workers GRM. For the two GRMs, the Project will establish Grievance Redress and Management Committees (GRCs) at National and District and community with representation from the beneficiary schools.

### 14.3.1. Community GRM

The proposed community GRM for this project is a 4 tier/level grievance handling procedure. Grievances at the project level will be handled by committees set up at the 4 different levels that include: -

1. **Grievances handling at National Level:** Grievances will be handled at the project’s level by MoET project Coordinating Unit (PCU) which will setup the national level committee. The PFU will inform stakeholders about the grievance procedure and will keep a log of complaints received, like all the other levels. (
2. **Grievance handling at District level:** These will handle grievances that have come from the schools and the community GR committees, that are related to project and are unresolved at the school level. The committee will solve grievances at the district level, in case they need referral those grievances will be sent to the National level.
3. **Grievance Handling at Community level:** These will handle grievances reported by the community members relating to project. The GRC at this level will be specific to addressing the concerns of the communities as provided for under ESS7. These grievances will be solved following the existing government structures to solve grievances at the level. Where they fail is when they will forward the grievances to the district level handling the project issues.
4. **Grievance handling at schools’ level:** These will handle grievances that occur at school level or reported to the school but related to the project. The GR Committee at this level will handle grievances at that level, where they fail, that’s when they will forward grievances to the district level Committee.

The GRMs will be accessible to all stakeholders, including learners, parents, teachers, community members, civil society, media, and any interested parties. Stakeholders will use the GMs to submit complaints related to the overall management and implementation of the project. The school and community level GRCs will submit monthly reports to the district level GRCs who will then submit monthly reports to national level GRC at the MoET/PFU. All the GRCs for the various GRM tiers will receive training on receipt of complaints, logging complaints, grievance resolution, documentation and record keeping, appeal process

## 14.4. Description of GM

**The Table 9. below illustrate the steps, purposes, timeframe, and stakeholders responsibilities**.

|  |  |  |  |
| --- | --- | --- | --- |
| **Step** | **Description of Process** | **Time Frame** | **Responsibility** |
| GM implementation structure | GM structure at national, regional, and local levels] | Upon implementation of LEIP | PFU |
| Grievance uptake | Grievances can be submitted via the following channels:   * [e.g., Toll-free telephone hotline/Short Message Service (SMS) line * E-mail * Letter to Grievance focal points at local facilities * Com * plaint form to be lodged via any of the above channels. * Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box] | Upon receipt of complaint | Local grievance focal points |
| Sorting, processing | Any case received will take a maximum of 5 days to resolve. This is so to make sure that grievances/complaints are resolved as early as possible.  The GRCs shall assess whether the complaint or grievance is related to this Project activity implementation or not. In a situation where the complaints are not related to the project, people affected s shall be advised to channel their complaints to the right institutions. For Project specific complaints or grievances, GRCs shall hear such cases and make necessary follow ups to gather evidence and make necessary determination.  The outcome of the analysis shall be communicated to the PAP and shall be recorded on a grievance resolution agreement minute (GRAM)  Grievance feedback shall be communicated with complainants, among others, by telephone, fax, email, or in writing and authorized meetings where necessary | Upon receipt of complaint | Local grievance focal points |
| Acknowledgment and follow-up | Receipt of the grievance is acknowledged to the complainant by Grievance Management Committee | Within 2 days of receipt | Local grievance focal points |
| Verification, investigation, action | Investigation of the complaint is led by [GMC] A proposed resolution is formulated by [GRM Committee] and communicated to the complainant by [mail, letter or by phone] | Within 10 working days | Local grievance focal points |
| Monitoring and evaluation | Data on complaints will be collected in 2 days and reported to GRM Committee upon the complaint. | In 10 working days | Local grievance focal points |
| Provision of feedback | Feedback from complainants regarding their satisfaction with complaint resolution is collected by GRM Committee | In 5 working days | Local grievance focal points |
| Training | Training needs for staff/consultants in the PFU, Contractors, and Supervision Consultants are as follows:   * Grievance Redress procedure, * monitoring and evaluation, receipt of complaints, * logging complaints, grievance resolution, documentation and record keeping, appeal process | Upon the Project Implementation | PFU |
| If relevant, payment of reparations following complaint resolution | [Describe how reparations will be handled including amounts, recipients, etc.] |  |  |

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

## 14.5. GRM Procedure

The grievance procedure at project level will be administered at the local levels to facilitate access, flexibility and ensure transparency. The procedure will have six major stages. These stages include:

1. The complaint or grievance uptake
2. Assessment, analysis and response
3. Resolution and closure
4. Registry and monitoring
5. GRM Evaluation
6. Appeals process.

Step 1: Submission of grievances Multiple channels will be availed to the public for channeling complaints on the project, including:

* Toll-free telephone hotline.
* E-mail: a dedicated email address will be shared for public use; and
* Letter to Grievance focal points at schools/local health facilities.
* Complaint form to be lodged via any of the above channels.
* Walk-ins may register a complaint on a grievance logbook at schools/healthcare facility or suggestion box at schools/clinic/hospitals.
* Verbal communications-talking to the affected parties directly, that may involve negotiations, mediation and arbitrations.

The project GRM will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the WB ESF Good Practice Note on SEA/SH. Anyone from the affected communities or anyone believing they are affected by the Project can submit a grievance: By completing a written grievance registration form that will be available at the GRC level offices including the School and District education offices as well as at the MoET/PFU. Complainants may also be submitted orally, and the details of the complaint entered in the GRM log. The complainant will attach all copies of documents that support their complaints. Staff at MoET and GRCs will ensure that the form is filled accurately. The complainant will receive a receipt or a confirmation email of acknowledgment with a reference number to track their complaint(s).

### Stage 2: Assessment, Analysis and Response

When a complaint is received, a maximum of 5 days will be provided for a receiving GRC to resolve the complaint or respond to the Project Affected Persons (PAP). This is so to make sure that grievances/complaints are resolved as early as possible. Once complaints are received, the GRCs shall assess whether the complaint or grievance is related to this Project activity implementation or not. In a situation where the complaints are not related to the project, PAPs shall be advised to channel their complaints to the right institutions. For Project specific complaints or grievances, GRCs shall hear such cases and make necessary follow ups to gather evidence and make necessary determination. The outcome of the analysis shall be communicated to the PAP and shall be recorded on a grievance resolution agreement minute (GRAM). Grievance feedback shall be communicated with complainants, among others, by telephone, email, or in writing and authorized meetings where necessary.

### Stage 3: Resolution and Closure

Where a resolution has been arrived at and the PAP accepts the resolution, the PAP shall be required to sign the resolution and closure. Two members of the specific GRC (Chairperson and Secretary) shall also be required to counter sign. This shall signify that the complaint or grievance which was presented, has been fully discussed resolved and closed.

### Stage 4: GRM Registry

All received complaints will be recorded in the complaints logbook or grievance excel sheet/grievance database. A register shall be kept at all GRCs at all levels to ensure proper record of all complaints and their resolutions. For any case heard, closed or referred to an upper level GRC, a copy of logs and resolution forms for every case shall be submitted as well. This shall enable the GRCs to keep a register of all cases recoded and handled by them. Using this information, the GRM will be able to generate a matrix of cases and agreed resolutions and be able to follow up if the resolutions are being implemented.

### Stage 5: GRM Evaluation

The GRM evaluation can be undertaken alongside any other evaluation exercises for the project. This will be possible using copies of registers that the GRCs will be keeping. This may assist to trace whether the GRM system was efficient and effective to respond to peoples’ complaints and whether the GRM principles were met during the project implementation. The GRM shall contribute a lot to the efficient running of the project as it shall assist to investigate complaints and bring up a much clear version of the complaint at an earliest time possible, provide a fair and speedy means of dealing with complaints, prevent minor disagreements from developing into more serious disputes, thereby, providing a simple, speedy and cost-effective mechanism of re-installing satisfaction to the ones that were affected.

### Step 6: Appeals process:

The GRM will provide an appeal process if the complainant is not satisfied with the proposed resolutions of the complaints at different levels of the GRMS. Where the PAP is not satisfied with the outcome of his/her complaint, the GRC shall make provision for him/her to appeal to an upper level GRC for further re-address up to the legal recourse. Some cases such as rape and theft which are criminal in nature and need evidence in the court may go through referral pathway including the police to avoid destruction of evidence required legally. The project personnel will be required to provide additional information or evidence as witnesses in a court of law in case of need.

## 14.6. Labour Related Grievance Mechanism

In order to create a working environment that provides safety and security to all workers, a separate GRM which responds to the requirements of ESS2 will be established for project workers to lodge their complaints relating to their working environment or conditions. For direct workers, the mechanism will involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides feedback to those concerned, without any retribution. The contracted workers and suppliers will inform their teams of the grievance mechanism at the time of hiring and make it easily accessible to them.

### 14.6.1. Gender Related Grievance Mechanism

All GRCs will be engaged on how to manage GBV cases and all referral pathways involved to successfully handle GBV cases as highlighted in the MoET guidelines. The PFU will develop a GBV Action Plan that will identify service providers in the project areas with minimum package of services (health, psychosocial, legal/security, safehouse/shelter, livelihood).The project will adopt the survivor centred approach in all case management processes.

### 14.6.2. Grievance Tracking and Reporting by the PFU

The PFU will take the overall charge of logging, tracking and reporting on all the project related grievances. The national GRC will be accessible to all stakeholders, including affected people, community members, educationists, civil society, media, and any interested parties. The PFU will therefore maintain a log of complaints received during project implementation and also ensure that they are regularly tracked to the conclusion to the satisfaction of the PAPs. From the District reports on grievance management, the PFU will prepare a monthly status report on the progress made in handling all grievances received via the GRM and information on their resolution, and any other relevant information. The PFU will submit periodic reports on project implementation to the Bank as per grant conditions including a summary of grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions.

### 14.6.3. The possible LEIP Grievances

The anticipated types of Grievance that may emanated as result of LEIP project implementation include the following but limited to.

**Engineering/ construction Related Grievances**

Grievance under this category is anticipated to arise either at planning or implementation stage LEIP. The major issues related to engineering will be more relevant to issues of construction and design of new school and reception classes under component 2 of LEIP. In case an engineering related grievance arises during implementation or maintenance phase, the grievance will be escalated to the respective Project Manager or District Manager for assessment and subsequent escalation to the relevant technical officers for resolution.

**Survey Related Grievances**

Grievances under this category is anticipated to arise at implementation and planning stage where affected parties including community may feel not to have been properly informed about the objective of the project, the process and not to have been given reasonable notice to enter their communal territory. In case situations arise and grievances emerge from this process, the Head of Survey and Documentation should be notified to prepare appropriate response to the aggrieved parties. An engagement with the aggrieved parties to clarify issues may be arranged too.

**Environmental Related Grievances**

Environmental related grievances may arise at any stage of the project management cycle as a result of disturbance of natural ecosystems, inadequate management of project impacts, inadequate restoration of sites or failure to consult, sensitize and disclose potential project impacts to affected communities. When these kinds of impacts arise, the Head of Environment and Social Safeguards should be notified to assess the grievance and either implement appropriate mitigation measures or prepare appropriate response stakeholders.

**Social Related Grievances**

Similar to environment, social related grievances may arise at any stage of the project management cycle as a result of inadequate consultation, sensitization, and or disruption of social setups by migrant workers. There are also situations when social grievances arise out of unrealistic expectations. When these kinds of impacts arise, the Head of Environment and Social Safeguards should be notified to assess the grievance and either implement appropriate remedial measures or prepare appropriate response to stakeholders.

**Labour Management Related Grievances**

Similar to environment, labour related grievances may arise at any stage of the project management cycle as a result of inadequate consultation, sensitization, and or unsatisfactory workers working conditions or renumeration.

# 15.0. Monitoring and Reporting

## 15.1. Monitoring

The Project will provide opportunity to stakeholders, especially Project Affected Parties to monitor certain aspects of project performance and provide feedback. GRM will allow stakeholders to submit grievances and other types of feedback. The MoET will continue to use consultative methods that include online meetings, radio announcements, radio programme on various media (mainly radios), printing and distribution of leaflets. In addition, during the course of implementation of the project, the other alternative methods such as TV, newspaper, radio, dedicated phone-lines, and mail and social media and online channels, dedicated online platforms and chatgroups will be maintained and used as the means of communication.

## 15.2. Reporting

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 compiled by responsible staff and referred to the PFU. 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. The end of project report will provide a summary of all public consultation issues, grievances and resolutions. The report will provide a summary of relevant public consultation findings from informal and informal meetings held at community level.