



**MINISTRY OF SOCIAL DEVELOPMENT
(MoSD)
PATHWAYS TO SUSTAINABLE LIVELIHOODS PROJECT (PSLP)
(P177814)**



Volume 2: The SEP

STAKEHOLDER ENGAGEMENT PLAN (SEP)

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Maseru

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OTHER REPORTS IN THIS SERIES

The Lesotho Pathways to Sustainable Livelihoods Project (PSLP), Stakeholder Engagement Plan (SEP) forms part of a series that 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 Social Development sector of the Kingdom of Lesotho and the instrument has been developed based on the local conditions and findings.

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1. **Volume 1: The ESIA**
PATHWAYS TO SUSTAINABLE LIVELIHOODS PROJECT (PSLP)
ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

2. **Volume 2: The SEP**
PATHWAYS TO SUSTAINABLE LIVELIHOODS PROJECT (PSLP)
STAKEHOLDER ENGAGEMENT PLAN (SEP)

3. **Volume 3: The ESCP**
PATHWAYS TO SUSTAINABLE LIVELIHOODS PROJECT (PSLP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

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PATHWAYS TO SUSTAINABLE LIVELIHOODS PROJECT (PSLP)
ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

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LIST OF ABBREVIATIONS

DEO	District Environmental Officer
DoP	Department of Planning
DPS	Deputy Principal Secretary
EA	Environmental Assessment
E&S	Environment and Social
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
GBV	Gender Based Violence
GDP	Gross Domestic Product
GIIP	Good International Industry Practice
GoL	Government of Lesotho
GRM	Grievance Redress Mechanism
HIV	Human Immunodeficiency Virus
ICT	Information and Communication Technology
KRA	key result areas
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
MoDP	Ministry of Development Planning
MoF	Ministry of Finance
MoSD	Ministry of Social Development
MTEC	Ministry of Tourism, Environment and Culture.
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
OHS	Occupational Health and Safety
OVC	Orphans and Vulnerable Children
PDO	Programme Development Objective
PMU	Project Management 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

1. INTRODUCTION

1.1 PROJECT DESCRIPTION

The Project Development Objective for the Pathways to Sustainable Livelihoods Project (PSLP) is “to support the Government of Lesotho (GoL) to improve the efficiency and effectiveness of select social assistance programs and to strengthen the livelihoods of poor and vulnerable households”.

The project aims to build on the achievements of the previous Social Assistance Project (P151442) and contribute to an inclusive recovery in Lesotho. The project aims to do this by a) investing in modern delivery systems which enhance cost-efficiency, reduce leakage and improve targeting of adequate benefits to the most vulnerable; and b) providing immediate relief in case of a shock as well as enhanced livelihoods support (“cash plus”) to targeted poor households, supporting their recovery from the pandemic, building their resilience and human capital ahead of future shocks.

The project also supports several priorities identified in the NSPS II and III including a) strengthening delivery system, b) providing “cash plus” interventions, and c) expanding access to social protection for the poorest and most vulnerable, including in response to shocks. The specific components and sub-components of the project are listed below:

Table 1-1 Proposed project Components and Sub-Components

1.0	Component 1: Developing efficient and responsive safety net delivery systems.	<i>Sub-component 1a. Expanding the use of digital payments</i>
		<i>Sub-component 1b. Enhancing the NISSA social registry for pro-poor targeting of social assistance.</i>
		<i>Sub-component 1c. Enhancing management information systems, building interoperability, and links to National ID.</i>
		<i>Sub-component 1d. Improving the adequacy of social assistance and providing opportunities for children with disabilities.</i>
		<i>Sub-component 1e. Improving harmonized social services through case management and Grievance Redress Systems.</i>
2.0	Component 2: Supporting sustainable livelihoods with a focus on improving nutrition.	<i>Sub-component 2a. Supporting improved nutritional outcomes.</i>
		<i>Sub-component 2b. Supporting resilient livelihoods.</i>
3.0	Component 3: Providing emergency cash transfers to respond to climatic and other shocks.	Contingency finance for emergency cash transfers
4.0	Component 4: Project management, M&E and capacity building.	Project management / operational costs

The Project will apply the World Bank’s Environmental and Social Framework (approved in 2018). The following E&S Standards are deemed relevant to the Project:

Table 1-2 Standards that are relevance to the NHSS Project

No.	E & S STANDARDS	RELEVANCE
1	Assessment and Management of Environmental and Social Risks and Impacts.	Relevant
2	Stakeholder Engagement and Information Disclosure.	Relevant
3	Labor and Working Conditions.	Relevant
4	Resource Efficiency and Pollution Prevention and Management.	Relevant
5	Community Health and Safety.	Relevant
6	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.	Not relevant
7	Biodiversity Conservation and Sustainable Management of Living Natural Resources.	Not relevant
8	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.	Not relevant
9	Cultural Heritage.	Not relevant
10	Financial Intermediaries.	Not relevant

1.2 PURPOSE AND OBJECTIVES OF THE STAKEHOLDER ENGAGEMENT PLAN

The overall purpose of SEP as stated in the ESS-10 is to ensure open and transparent engagement between the borrower and project stakeholders. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhances project acceptance, and makes significant contribution to successful project design and implementation. Therefore, the purpose of the SEP is to provide a framework for appropriate stakeholder consultation and information disclosure in the context of the DRIVE project, which meets both National legislation and World Bank ESF requirements. The goal of the SEP is to facilitate project participatory decision-making by involving project-affected parties¹ (PAPs), citizens in the project locations, and other stakeholders in a timely manner so that these groups are provided enough opportunity to voice their opinions and concerns to shape both the design and implementation of the project.

The overall objectives of SEP as stated in the ESS-10 are to:

- Identify stakeholders and establish their roles and responsibility of all stakeholders and ensure their participation in all stages of the project cycle;

¹ Individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits.

- Establish a systematic approach to stakeholder and citizen engagements that will help to identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties;
- Assess the level of stakeholder interest/influence and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance;
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project cycle on issues that could potentially affect them;
- 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 taking special consideration for the disadvantaged or vulnerable groups; and
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the Project Implementing Entity and its Project Implementation Unit to respond to and manage such grievances.

Specifically, the SEP serves the following purposes:

- i) Stakeholder identification and analysis
- ii) Planning how the engagement with stakeholder will take place
- iii) Information disclosure
- iv) Consultation with stakeholders
- v) Addressing and responding to grievances
- vi) Monitoring and reporting on SEP.

This SEP will be disclosed by MoSD the Project Implementing Agency, to the key stakeholders and the Ministry on its website. This SEP describes how the Project will engage internal and external stakeholders during planning, implementation, monitoring and evaluation phases of the project. The SEP outlines the following: (i) project description; (ii) previous stakeholder engagement activities; (iii) stakeholder identification and analysis as part of stakeholders mapping; (iv) stakeholder engagement program (activities); (v) resources and responsibilities for implementing stakeholder engagement activities; (vi) GRM; and (vii) monitoring and reporting.

This plan is considered to be a 'live' document and may be amended periodically considering operational changes and experiences during its implementation

1.3 APPROACHES TO STAKEHOLDER ENGAGEMENT

The project's Stakeholder Engagement Plan (SEP) has been 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 in a timely, open and effective manner;
- Inclusiveness is achieved when broad participation is encouraged and supported by appropriate participation opportunities;
- Trust is achieved through open and meaningful dialogue that respects and upholds community's beliefs, values, and opinions.

1.4 WHAT IS STAKEHOLDER ENGAGEMENT?

Stakeholder Engagement will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format. It involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and opinions (e.g., by way of meetings, surveys, interviews and/or focus groups), and ensures that this information is taken into consideration when making project decisions.

Effective stakeholder engagement develops a “social licence” to operate and depends on mutual trust, respect and transparent communication between MoSD and its stakeholders. It thereby improves its decision-making and performance by:

- **Managing costs:** Effective engagement can help PSLP avoid costs, in terms of money and reputation;
- **Managing risk:** Engagement helps PSLP and communities to identify, prevent, and mitigate environmental and social impacts that can threaten project viability;
- **Enhancing reputation:** By publicly recognising human rights and committing to environmental protection, MoSD and financial institutions (World Bank) involved in financing the project can boost their credibility and minimise risks;
- **Avoiding conflict:** Understanding current and potential issues such as rights to service provision and proposed project activities;
- **Improving corporate policy:** Obtaining perceptions about a project, which can act as a catalyst for changes and improvements in MoSD corporate practices and policies;
- **Identifying, monitoring and reporting on impacts:** Understanding a project’s impact on stakeholders, evaluating and reporting back on mechanisms to address these impacts; and
- **Managing stakeholder expectations:** Consultation also provides the opportunity for MoSD to become aware of and manage stakeholder attitudes and expectations.

1.5 PRINCIPLES FOR EFFECTIVE STAKEHOLDER ENGAGEMENT

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.

1.6 STAKEHOLDER ENGAGEMENT CONSIDERATIONS

The following considerations should be made when planning for stakeholder engagement:

1.6.1 Time and resources:

It takes time to develop and build trust-based relationships with stakeholders. The consensus from practitioners is that from the outset relationships with stakeholders should develop and grow and that these relationships should be nurtured and fostered not to fade.

Additional stakeholders might be identified that also want to be engaged. No willing stakeholder should be excluded from the process of engagement. Some stakeholders will need to be educated about the concept of engagement itself, as well as on the complex issues requiring specialized and technical knowledge. These demands can increase the cost of consultation required to meet external expectations, and often this occurs at a time when a project lacks the internal capacity and resources to implement a broad engagement strategy.

1.6.2 It raises expectations:

Stakeholders can have unrealistically high expectations of benefits that may accrue to them from a project. As such MoSD from the outset must be clear on what they can and cannot do, establishing a clear understanding of their roles and responsibilities.

In PSLP areas, the engagement processes should provide MOSD with an opportunity to develop relationships with stakeholders and potential project partners.

1.6.3 Securing stakeholder participation:

Cultural norms and values can prevent stakeholders from freely participating in meetings. Often there are conflicting demands within a community, and it can be challenging for a project to identify stakeholders who are representative of common interests. This might be avoided by employing local consultants who are sensitive to local power dynamics, which requires project proponents developing an awareness of the local context and implementing structures to support and foster effective stakeholder engagement.

1.6.4 Consultation fatigue:

Moreover, there is evidence to suggest that stakeholders can easily tire of consultation processes especially when promises are unfulfilled, and their opinions and concerns are not taken into consideration. Often stakeholders feel their lives are not improving as a result of a project and this can lead to consultation meetings being used as an area to voice complaints and grievances about the lack of development. This might be avoided by coordinating stakeholder engagement and by ensuring PSLP Consultants do not make promises to stakeholders, but rather use the public consultation process as an opportunity to manage expectations, challenge misconceptions, disseminate accurate project information, and gather stakeholder opinions which are feedback to the client and other project specialists.

2. REGULATION AND REQUIREMENTS

The PSLP SEP takes into account the existing institutional and regulatory framework within the context of Lesotho and international laws. These applicable laws and international good practices are discussed below:

2.1 RELEVANT NATIONAL LEGISLATION

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

Table 2-1 Summary of Legislation and Guidelines

NO.	LEGISLATION	PURPOSE
1.0	The Constitution of Lesotho	
1.1	The Constitution of Lesotho	<p>One of the aims of the Constitution is promoting and consolidating sustainable socio-economic development in the country through the mainstreaming of environmental and social considerations in project planning and implementation.</p> <p>Chapter 23, <i>Section 36</i>: 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 endeavor to ensure for all citizens, a sound and safe environment adequate for their health and well-being.</p>
2.0	RELEVANT LESOTHO POLICES AND PLANS	
2.1	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.
2.2	Gender and Development Policy (2003)	The overall goal of the policy is to take gender concerns into account in all national and sectoral policies, programmes, budgets and plans in order to achieve gender equality in the development process.
2.3	National Strategic Development Plan (NSDP) 2012/13-2016/17 Human and Social Development	<p>Social Protection:</p> <p>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 job search and Increase capacity for disaster risk management at household, community and national level.</p>
2.4	National Policy on Social development 2014/2015	<p>The National Policy on Social Development provides a framework for the development and implementation of programmes to enhance human wellbeing. It sets out to promote interventions that are preventive, protective, promotive and transformative in orientation, to improve the welfare of the people, particularly vulnerable groups. The policy also seeks to prevent and reduce poverty, deprivation and inequality in Lesotho; empower individuals and communities to be self-sufficient; protect vulnerable groups to ensure the fulfilment of their rights and the realisation of their potential; and facilitate the coordination of social development efforts.</p> <p>The Policy has eleven (11) priority areas, which are: combating poverty, deprivation and inequality; protection of older persons; protection of children; HIV and AIDS; gender equality; disaster risk management; empowerment of youth; protection and rehabilitation of persons with disabilities; substance abuse; rehabilitation of prison inmates and ex-inmates; and family preservation and community development.</p> <p>The Policy also states that its implementation shall be a shared responsibility between State and non-State actors, with the Government being responsible for the coordination of all social development efforts.</p>

NO.	LEGISLATION	PURPOSE
3.0	Relevant Lesotho legislation	
3.1	The Environmental Management Act (EMA) 2010.	<p>Environment Act makes provision for the protection and management of the environment and conservation and sustainable utilization of natural resources of Lesotho (GoL, 2001a),.</p> <p>Among other things the Act sets out the requirements for public participation in the design of (sub-) projects and for the dissemination of information relevant to these projects (disclosure).</p> <ul style="list-style-type: none"> •
3.2	Local Government Act 1997	<p>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.</p> <p>To this end, Community Councils have the power to make by-laws in the Social Development sector.</p>
4.0	Relevant Statutory Instruments (SI)	
4.1	Guidelines for EIA in Lesotho, 2008.	<p>In 2010, Lesotho promulgated an Environment Act which provides for the EIA process. Following the enactment of the Act, the final guidelines for EIAs were issued.</p> <p>The Guidelines for EIA (GoL, 2010b), are aimed at facilitating participation in and compliance with Lesotho's EIA requirements by the developers. They are also aimed at "integrating environmental concerns and economic development from the earliest stages of the project development.</p>

2.2 WORLD BANK REQUIREMENTS

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 ESS, 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 ESS 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 10: Stakeholder Engagement and Information Disclosure**
The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10 "Stakeholder Engagement and Information Disclosure", recognizes 'the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice'. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. Borrowers will engage in meaningful consultations with all stakeholders.
- Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not.
- A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It must be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower must disclose the updated SEP. According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

2.3 GAP ANALYSIS BETWEEN NATIONAL LEGISLATION AND WORLD BANK

The table below provides a brief analysis of the gaps and differences between the national legislation and World Bank requirements and details how these gaps will be addressed under the Project.

Table 2-2 Gap Analysis between the National Legislation and World Bank ESS

National legislation	World Bank	Project
The national legislation has no provision for the development of a specific stakeholder engagement plan for public consultations.	Consultations with stakeholders and public involvement are the integral parts in the development and implementation of the SEP.	Lesotho currently does not have clear national legislative provisions on stakeholder engagement for specific investment programs and projects. It thus relies on the relevant provisions of the WB requirements. The PSLP will carry out a comprehensive consultative process with project - affected persons, local authorities, and other stakeholders as may be required. This will be done through public disclosure meetings, individual consultations and public consultations
Consultation and disclosure Consultation requirement not provided for directly in legislative or constitutional provisions.	The ESS10 requires that project-affected persons, host communities and local NGOs, be consulted as appropriate. Providing them opportunities to participate in the	While the consultation requirement is inherent in the EIA procedures, it contains a number of differences with the requirements of ESS10,

	<p>planning, implementation, and monitoring of the program, especially in the process of developing and implementing the procedures for determining eligibility for development assistance, and for establishing appropriate and accessible grievance mechanisms.</p>	<p>Despite the differences identified, the practice has been that where consultation is done, proceedings are conducted in the local language. This is significant considering the composition of those most likely to be affected.</p>
<p>The national legislation has provisions that allow citizens to make complaints and grievances, but these provisions do not accommodate anonymity. The anonymous or submitted petitions without indicating the petitioner's contact details are not entertained.</p>	<p>The World Bank ESS10 allows the option of anonymous provision of grievances.</p>	<p>The project will apply the WB standard and allow anonymous submission of grievances and complaints.</p>
<p>The national legislation does not have special provisions to address the concerns of the vulnerable groups during the consultation process.</p>	<p>The ESS10 specifically provides for the identification and engagement with the vulnerable groups that might be affected by the project to ensure that these groups also benefit from the project activities.</p>	<p>The SEP will identify affected vulnerable persons and engagement mechanisms to ensure that their voice is heard, and the concerns are addressed to the extent possible by the project.</p>
<p>The national legislation does not have provisions to establish a Project specific GRM.</p> <p>However there are various legislative measures that govern the rights of persons with formally recognized interests in a project, providing for procedural redress and complaint mechanisms, including determination by the High Court and Court of Appeal of disputes arising from conflicting claims or interests</p>	<p>According to the ESS 10 and ESS 2 the Project specific GRM should be established and be easily acceptable for all stakeholders at each stage of Project, including specific GRM for project workers</p>	<p>The Project specific GRM will be established for all stakeholders at each stage of the Project, including GRM for all project workers².</p>

² Directly engaged people (PIU staff and consultants) and contracted workers (people employed or engaged through contractors/ subcontractors that will perform work for specific project activities).

3. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1 PURPOSE OF THE PRESENT STAKEHOLDER ENGAGEMENT PLAN

The purpose of the present Stakeholder Engagement Plan is, among others, to provide information on how Stakeholder Engagement will be practiced throughout the project and which methods will be used as part of the process; as well as to outline the responsibilities of the Ministry of Social Development (MoSD). While the project is classified as moderate and 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 the Pathways to Sustainable Livelihoods Project (PSLP), MoSD will be the lead implementing agent through its various departments at Head Office and its District structures. The Implementation will be done through a Programme Management Unit (PMU) under the supervision of the Director Planning of the Ministry of Social Development (MoSD). The Ministry will be responsible for the overall coordination, supervision and monitoring, with the assistance of other Government Agencies as programme components may demand.

As part of the current consultations during the preparation of PSLP, the MoSD are engaged in ongoing dialogue with all stakeholders within the Social Development Sector. They have informed the main stakeholders on the Project design, indicated its openness for feedback on the Project design, and informed them on the applicability of the WB's ESF to PSLP. MoSD has also stressed the importance of stakeholder engagement with the primary beneficiaries of the project – The Poorest of the poor, the disadvantaged, women and youths in the target constituencies (communities with low poverty rates).

The current stakeholder engagement process is out line in Appendix 4. A half a day workshop was conducted on the 17 th of March 2022, to introduce the PSLP to the major stakeholders. The agenda of the workshop covered an overview of the PSLP project and the environmental and social assessment process of the project. The list of the stakeholders who attended the workshop is presented in Table 3-1.

Table 3-1 List of Stakeholders who have been engaged.

FULL NAME	USER ACTION	ORGANIZATION
Tlali MAPHOMANE	Joined	MOSD-Planning
Keketso (Guest)	Joined	
ramoeti (Guest)	Joined	MOSD-Planning
Mankhatho Linko	Joined	MOSD-Planning
Raliengoane, Malefetsane	Joined	CD
Boitumelo Mofolo	Joined	OVC Coordination
Matumelo Letlala (Guest)	Joined	MOSD BERA
sibekile mtetwa	Joined	
Mathabo Pama (Guest)	Joined	DISABILITY
Refuoe Pakela (Guest)	Joined	MOSD-CD
Clark, Peter	Joined	CRS
Nkopa (Guest)	Joined	MoSD-Qacha's Nek
Mats'ela Mats'ela (Guest)	Joined	MOSD-Planning
Mosili Liphoto (Guest)	Joined	MOSD-Thaba-Tseka
mona (Guest)	Joined	MOSD-CD

MAMTSHENGU TSHABALALA (Guest)	Joined	MOSD-Elderly
Boetile (Guest)	Joined	MOSD-Mokhotlong
Mampaka Kunene (Guest)	Joined	Help Lesotho
Teboho Putsoane (Guest)	Left	MOSD-Planning
Mankeane (Guest)	Joined	FNCO
Falimehang Rameno (Guest)	Joined	
Nkhasi Sefuthi (Guest)	Joined	LANFOD
Felleng Lethola (Guest)	Joined	Lesotho Age Network

The initial, remote consultations took in December 2021, and its main purpose was to introduce the project and gather stakeholders' views and perceptions on the proposed project. The Project will conduct more in-depth stakeholder engagement before the appraisal of the Project (by May 2022), and will continue to do so throughout Project implementation. Currently, due to the ongoing COVID-19 pandemic, the public health situation does not enable in-person consultations, and hence any engagement so far has been conducted remotely through phone and video calls.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 STAKEHOLDER IDENTIFICATION

To develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. This information is then used to tailor engagement to each type of stakeholder. As part of this process, it is 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.

It is also important to understand how each stakeholder may be affected – or perceives they may be affected – so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

Project stakeholders are defined as individuals, formal or informal groups and organizations, and/or governmental entities whose interests or rights will be affected, directly or indirectly by Project, both positively and negatively, who may have an interest, and who have the potential to influence to the Project outcomes in any way. Stakeholders have been and will continue to be identified on a continuing basis by identifying:

- Various stakeholder categories that may be affected by, or be interested in, the Project;
- Specific individuals, groups, and organizations within each of these categories taking into account,
- The expected Project area of impact, that is the geographical area over which it may cause impacts (both positive and negative) over its lifetime, and therefore the localities within which people and businesses could be affected,
- The nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions, and other bodies who may have an interest in these issues.

Based on the project strategy, the key stakeholders and their perceived functions in the project are depicted in figure 4-1 below which outlines the implementation arrangements which underpin the links between key role-players in the implementation of the proposed project activities.

In accordance with the ESS10, this SEP categorizes the stakeholders into three groups in order to ensure a more efficient and effective stakeholder engagement:

- **affected parties** - stakeholders that are affected or may be affected by the project;
- **other interested parties** - other parties who may have an interest in the project.
- **vulnerable/ disadvantaged groups** - individuals or groups who may require special engagement efforts due to their vulnerable status.

4.1.1 Affected Parties

For the purposes of the SEP document, stakeholders who are likely to be directly affected, and involved in the implementation of the policy, are classified as **Affected Parties**, and they include the following:

a) Implementing Entity:

- Ministry of Social Development (MoSD)
- PSLP PMU

b) Key Ministries:

- Ministry of Finance and (MoF)

- Ministry of Development Planning (MoDP)
- Ministry of Gender, Youth, Sports and Recreation (GYSR)
- Department of Environment (DoE)

c) The residents of communities

d) Local Leadership

4.1.2 Other Interested Parties

Other Interested Parties include individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the Project and/or who could affect the project and the process of its implementation in some way. Other interested parties include, among others, government institutions that may be involved in various ways in the project, as well as academia, civil society, international organizations, the media etc.

a) Participating Ministries:

- Ministry of Small Business, Cooperatives and Marketing (MSBCM)
- Ministry of Agriculture and Food Security (MAFS)
- Department of Rural Water Supply Services (DRWS)
- Ministry of Health

b) Other Stakeholders:

- Environmental Officers at District Level
- PMU staff
- MAFS staff at District Level
- MoSD staff at District Level
- Other collaborating institutions.
- Local NGOs
- The World Bank

4.1.3 Disadvantaged and vulnerable groups

Disadvantaged and vulnerable groups are persons who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their representation in the consultation and decision-making process associated with the Project. The Project Team will take an effort to ensure that the vulnerable and disadvantaged groups are aware about the proposed project activities and has a possibility to submit their propositions/suggestions.

Disadvantaged/vulnerable individuals and groups are also those who may not have a voice to express their concerns or understand the impacts of the Project, and these are sometimes excluded from the SEP. Thus the PSLP - PFU will closely monitor the consultation process to ensure access and awareness of the project benefits to the following vulnerable categories:

- Low in-come households who are recipients of social assistance.
- Elderly people.
- Households with people with disabilities.
- Single-parent families

The list of other vulnerable categories will be developed as the project progresses. The Project recognizes that vulnerable people require special consideration, as they might be unable to participate, to the full

extent, in the consultation activities, and may also be disproportionately affected by some impacts. The PSLP - PFU will closely monitor the consultation process to ensure access and awareness of the equal access to the consultation process and to guarantee that their voice is taken into account in order to find and implement solutions to some specific situations or issues.

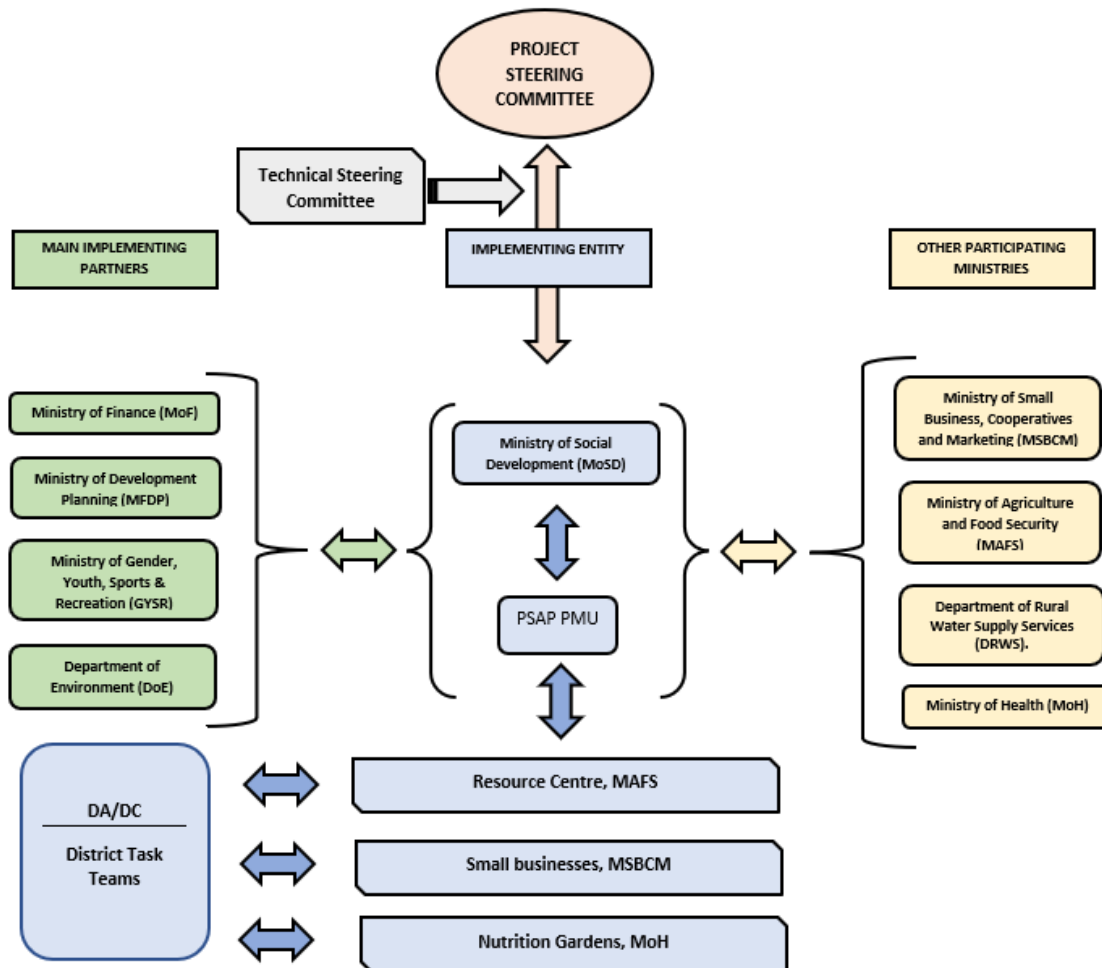


Figure 4-1 Implementation Arrangements

In addition to the social development team players seen on figures 4-1 it is worth mentioning that other role-players by virtue of their inherent existence in the social development will be included. These will include amongst others, representatives of proprietors i.e., churches, communities and government, and development partners such as UNICEF, etc.

4.2 STAKEHOLDER INTEREST AND INFLUENCE

Stakeholders were analyzed in terms of their interests and project impact to better understand and manage them. Individual consultations and discussions will take place with those, who have high levels of interest and project impact; any changes occurring during the project implementation will be communicated to them individually. Individual consultations will also take place with the group with a medium project impact and a high interest in the project. The group with a low project impact and a high project interest will be involved in public discussions, focus groups, and other forms of empowerment to increase their voice in the project design and implementation.

The following is an outline of the potential stakeholders and their functions:

a) Ministry of Social Development (MoSD)

The Ministry of Social Development (MoSD) was established in 2012 with a shift from welfare to development. This ministry has decentralized its services to the district and community level where services are headed by District Social Development managers. At the Community level, there is a new cadre of Auxiliary Social Development Officers who focus on the early identification and provision of basic services and referral to the next level which is the district.

MoSD will be the lead implementing agent for the Pathways to Sustainable Livelihoods Project (PSLP) through its various departments at Head Office and its District structures. The Implementation will be done through a Programme Management Unit (PMU) under the supervision of the Director Planning of the Ministry of Social Development (MoSD) and will be responsible for overall coordination, supervision and monitoring, with the assistance of other Government Agencies as programme components may demand.

b) Ministry of Finance and (MoF)

The Ministry of Finance's core business is the management, supervision and control of fiscal and financial affairs of government including custody, maintenance and care of government assets.

The ministry provides timely and accurate financial information, guidance, and advice in financial and fiscal policy. It also provides quality service that promotes macro-fiscal stability through effective and efficient utilization and management of public funds. The Ministry of Finance will be the lead agency in charge of the financing mechanism. In essence, it is the Borrower.

c) Ministry of Development Planning (MoDP)

The Ministry of Development Planning (MoDP) is a central coordinating Ministry in charge of reducing poverty levels through increased national and household incomes, economic growth, domestic production, employment, wealth, and investment. These are to be attained through the implementation of effective development, macroeconomic and fiscal policies through best plans and programmes.

d) Ministry of Gender, Youth, Sports and Recreation (GYSR)

The Ministry works towards the advancement of Gender equity and equality; the enhancement of sporting excellence and the integration of youth in the socio-economic and political development of the country.

The Ministry is made up of four departments and the relevant ones are the Department of Gender, and the Department of Youth:

- **Department of Gender**

The Department of Gender ensures equality of all opportunities between women, men, girls and boys, so that development efforts have an equal impact on all gender issues. Its aim is to facilitate proper integration of gender issues in development to ensure full involvement, participation and partnership of women and men, girls and boys in both their productive lives.

Through its policy, the Department of Gender takes gender concerns into account in all national and sectoral policies, programmes, budgets and plans in order to achieve gender equality in the development process.

- **Department of Youth**

The goal of the Department of Youth is to promote the dignity and self-esteem of all Lesotho youth; to ensure their physical, intellectual and moral well-being; and to take all measures to

accelerate their full participation in the socio-economic, cultural and political life as healthy, active and productive citizens of the nation.

Thus, Ministry of Gender, Youth, Sports and Recreation will spearhead the inclusion of women, youth and other disadvantaged groups like the disabled to participate in the PSLP project.

e) Department of Environment (DoE)

In 1994, the National Environmental Secretariat (NES) was established to advise the Government on all matters relating to environmental management. It spearheaded the development of Lesotho's Agenda 21 action Plan adopted in 1995. In 1998 the Department of the Environment (DoE), which was then part of the Ministry of Natural resources, was merged with NES and the new institution became the lead institution in environmental management. The Department of the Environment then appointed Environmental Units in line Ministries in order to strengthen the coordination of environmental activities. The units received some training in different aspects of environmental management but they are not fully effective because of under staffing.

The Department of Environment's principal responsibility is coordination, monitoring and supervision of environmental conservation activities. 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.

f) Participating Institutions.

The PMU will sign Inter Institutional agreements with participating institutions to define their roles and responsibilities and guarantee their assistance in implementing the Project. Participating ministries will be responsible for the technical oversight of specific activities under the Project, with the PMU performing fiduciary functions on behalf of participating institutions.

i) Ministry of Small Business, Cooperatives and Marketing (MSBCM)

The Ministry of Small Business, Cooperatives and Marketing (MSBCM) serves to promote entrepreneurial skills and transfer of appropriate technology and application of cutting-edge technology, through smart partnership of the public and private sectors. Among many other ways, this will be done by:

- identifying and assisting local entrepreneurs and the farming community to utilize export opportunities in order to improve the country's foreign exchange earnings and create growth in the industrial, commercial and agricultural sectors;
- facilitating the creation of a conducive and appropriately regulated environment for commercial and marketing activities in the country in order to improve the performance, and to support the growth, of local entrepreneurs and farmers;
- To increase producers market share, profit margins and on-farm income.

ii) Ministry of Agriculture and Food Security (MAFS)

Ministry of Agriculture and Food Security (MAFS) is responsible for all the agricultural activities in the country. It will be a major participating agent through its various departments at Head Office and its District structures. The responsible department at head office will be the Nutrition department and at district level each District Agricultural officer (DAO) and his team will be responsible, especially the Nutrition Officers.

The main goal of the MAFS is to combat malnutrition through food-based interventions to improve the food and nutrition security and quality of life of the population. Amongst its roles, it will strengthen the linkages between nutrition and agriculture to ensure the

effective implementation of food-based prevention and management of malnutrition.

iii) Department of Rural Water Supply Services (DRWS)

The MoW, through Rural Water and Sanitation Departments (DRWS), implements two distinct programmes to eliminate open defecation: a latrine subsidy programme and a community-led total sanitation programme. It will ensure the availability of safe potable water for the PSLP programmes.

iv) Ministry of Health

Ministry of Health (MoH) is responsible for all the Health and Health Care delivery activities in the country with particular emphasis on the prevention and eradication of priority health that are amenable to cost-effective interventions. Its mandate includes ensuring that maternal and child health and nutrition services are prioritized and implemented in the health sector. The Ministry integrates nutrition into all its activities.

Table 4-1 below summarizes the potential roles, interests, and influence for the main stakeholders mentioned above; Analysis and Prioritization of Stakeholder Groups Based on Level of Interest in and Influence over the Project

Table 4-1 Analysis and Prioritization of Stakeholders Groups.

Categories of Stakeholders	Role	Level of Analysis H-High, M=Medium, L=Low)	
		Interest	Influence
		Affected parties	
<ul style="list-style-type: none"> ▪ Ministry of Social Development (MoSD) ▪ PSLP PMU 	<ul style="list-style-type: none"> ▪ Main Project implementer ▪ Beneficiary Identification and Enrolment ▪ Development of operational Plans, Monitoring and Evaluation plans and Budget preparation ▪ Project Supervision and Monitoring as well as evaluation of the project ▪ Financial and Procurement management of the project 	H	H
<ul style="list-style-type: none"> ▪ Ministry of Finance and (MoF) ▪ Ministry of Development Planning (MoDP) ▪ Ministry of Gender, Youth, Sports and Recreation (GYSR) ▪ Department of Environment (DoE) 	<p>Key Ministries</p> <ul style="list-style-type: none"> • Provide Project Financial and procurement advisory • Member of the Project Steering Committee • Overall Monitoring of the Project implementation • Member of the Project Steering Committee • Ensure that Issues of Gender are being mainstreamed in to project design and implementation • Ensure issues related to Youths from poor and ultra-poor households are well mainstreamed into the project 	H	M

	design and implementation.		
The residents of communities.	Information Beneficiaries of investments	H	M
Local Leadership / Public Administration	Engagement/ Distribution of information related to the Project. Representing interests of locals.	H	H
Interested parties			
<ul style="list-style-type: none"> ▪ Ministry of Small Business, Cooperatives and Marketing (MSBCM) ▪ Ministry of Agriculture and Food Security (MAFS) ▪ Department of Rural Water Supply Services (DRWS) ▪ Ministry of Health 	<ul style="list-style-type: none"> ▪ Participating Ministries ▪ Technical support in the relevant fields. 	H	H
<ul style="list-style-type: none"> ▪ Environmental Officers at District Level ▪ PMU staff ▪ MAFS staff at District Level ▪ MoSD staff at District Level ▪ Other collaborating institutions. 	<ul style="list-style-type: none"> ▪ Other Stakeholders ▪ Technical support in the relevant fields. 	H	M
<ul style="list-style-type: none"> ▪ Development partners; UNICEF, FAO, WFP 	<ul style="list-style-type: none"> ▪ Technical support on Child Protection related issues ▪ Technical Support on food and agricultural activities ▪ Technical Support on food-related activities 		
Mass media and Local NGOs-World Vision, KB, CRS, Red Cross.	Communication/public information	M	M
Financial institution/ The World Bank	<ul style="list-style-type: none"> ▪ Funding, technical assistance ▪ Project interventions approval ▪ Project Interventions supervision and monitoring ▪ Project Funds disbursement 	H	M
Consultants and Contractors	Collaboration, implementation	H	M
Vulnerable groups			
Households with low-income	Beneficiaries of investments	H	L
Elderly people	Beneficiaries of investments	H	L
Households with people with disabilities	Beneficiaries of investments	H	L
Single-parent families	Beneficiaries of investments	H	M

4.3 SUMMARY OF PROJECT STAKEHOLDER NEEDS

Below table is a preliminary snapshot of stakeholder engagement needs:

Table 4-2 Stakeholder Engagement Needs.

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs
Village Level	Parents with young Children	Approximate households affected; children	Sesotho	Written information, radio, Pitso's/meetings	<ul style="list-style-type: none"> Child care for meetings. School fees assistance.
Village Level	Community Leaders Villagers.	extended families, poverty level	Sesotho, Sephuthi	Visit with translator and civil society representative	Graphics, education on selection process
District level	<ul style="list-style-type: none"> Government Officials District Administrators Extension Officers Health Workers 	Approximate households, individuals, etc they have assisted	Sesotho and English	Trained officials use Written information, radio, Pitso's/meetings.	Access to different media.
National Level.	<ul style="list-style-type: none"> Other collaborating institutions. NGOs 	Approximate households, individuals, etc they have assisted	Sesotho and English	Trained officials use Written information, radio, Pitso's/meetings	Access to different media.

5. STAKEHOLDER ENGAGEMENT PROGRAM

The Stakeholder Engagement Program is a formal document that outlines the plan to communicate with stakeholders who have interest or potential interest in a project. It helps engage all the stakeholders in the project and, by doing so, help the project become sustainable and inclusive. The SEP will also support the engagement of vulnerable groups that are facing hurdles to take part in the engagement directly for social, economic, or political reasons. It is important to keep in mind that SEP implementation is a dynamic process and some stakeholders and their interests might change over time or new stakeholders and information emerges, and hence the SEP will be updated accordingly. The project will continue to ensure compliance with national law, policies, and protocol requirements as well as WHO and World Bank guidance³ regarding the COVID-19 situation in relation to consultations and related activities as highlighted in section 5.1 below.

5.1 ENGAGEMENT METHODS TO BE USED

The Social Development Sector has a range of stakeholder groups as earlier identified. These include members of the community level governance structures, District Administration Structures, Ministry officials, and the general public. The Ministry of Social Development Information Office will be responsible for coordination of all these events and will keep a schedule of implementation of all outreach activities and will 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.

Table 5-1 Stakeholder engagement techniques

ENGAGEMENT TECHNIQUE	APPROPRIATE APPLICATION OF THE TECHNIQUE
Correspondences (Phone, Emails)	<ul style="list-style-type: none"> • Distribute information to Government officials, NGOs, Local Government, and organisations/agencies • Invite stakeholders to meetings and follow-up
One-on-one meetings	<ul style="list-style-type: none"> • Seeking views and opinions • Enable stakeholder to speak freely about sensitive issues • Build personal relationships • Record meetings
Formal meetings	<ul style="list-style-type: none"> • Present the Project information to a group of stakeholders • Allow group to comment – opinions and views • Build impersonal relation with high level stakeholders • Disseminate technical information • Record discussions
Public meetings (following COVID-19 guidelines)	<ul style="list-style-type: none"> • 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 • Distribute non-technical information • Facilitate meetings with presentations, PowerPoint, posters etc. • Record discussions, comments, questions.

³For example, see World Bank Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings March 20, 2020.

Focus group meetings	<ul style="list-style-type: none"> • Present Project information to a group of stakeholders (8- 15 people groups) • Allow stakeholders to provide their views on targeted baseline information • Build relationships with communities • Record responses
Project website	<ul style="list-style-type: none"> • Present project information and progress updates • Disclose SEP, GRM and other relevant project documentation
Project leaflet	<ul style="list-style-type: none"> • Brief project information to provide regular update • Site specific project information.
Surveys	<ul style="list-style-type: none"> • Gathering opinions and views from individual stakeholders • Gather baseline data • Record data • Develop a baseline database for monitoring impacts
Workshops	<ul style="list-style-type: none"> • Present project information to a group of stakeholders • Allow a group of stakeholders to provide their views and opinions • Use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies • Record responses

5.2 PROPOSED STRATEGY TO INCORPORATE THE VIEW OF VULNERABLE GROUPS

During the consultation process, the views of vulnerable or disadvantaged groups will be sought through a process of free, prior and informed consultation. This will be done during project preparation to inform them about the project, to fully identify their views, to obtain their broad community support to the project, and to develop project design and safeguard instruments. This process is best done as part of the social assessment although consultations are likely to continue after its completion.

For projects with no impacts or direct interventions with the vulnerable or disadvantaged communities, the local communities are informed about the project, asked for their views on the project, and assured that they will not be affected during project implementation.

For projects affecting vulnerable or disadvantaged communities, whether positively or adversely, a more elaborate consultation process is required. This may include, as appropriate:

- Informing the affected vulnerable or disadvantaged communities about project objectives and activities,
- Discussing and assessing possible adverse impacts and ways to avoid or mitigate them,
- Discussing and assessing potential project benefits and how these can be enhanced,
- Discussing and assessing land and natural resource use and how management of these resources may be enhanced,
- Identifying customary rights to land and natural resource use and possible ways of enhancing these,
- Identifying and discussing (potential) conflicts with other communities and how these might be avoided,
- Discussing and assessing food security and how it might be enhanced through project interventions,
- Discussing and eliciting customary norms of the vulnerable or disadvantaged groups and incorporating them into the project design.

- Eliciting and incorporating indigenous knowledge into project design,
- Facilitating and ascertaining the affected communities' broad support to the project,
- Developing a strategy for vulnerable or disadvantaged groups' participation and consultation during project implementation, including monitoring and evaluation.

All project information provided to vulnerable or disadvantaged groups should be in a form appropriate to local needs. Local languages should usually be used and efforts should be made to include all community members, including women and members of different generations and social groups (e.g. clans and socioeconomic background).

If the vulnerable or disadvantaged groups are organized in community associations or umbrella organizations, these should usually be consulted. In some cases, it may be appropriate or even necessary to include or use in the process independent entities that have the affected communities' trust. The experience of (other) locally active NGOs and experts may also be useful.

5.3 REVIEW OF COMMENTS

In engaging with the public, the implementing departments must document all the Information gathered and will organize and present this collated information for decisions making, addressing concerns that would have been raised, or keeping a record of any pertinent issues that might need to be referenced at any point in time during project implementation or at the end of the project. This will be done by documentation of presentations made, drafting of minutes from meeting or transcription of recordings of meetings.

5.4 FUTURE PHASES OF PROJECT

Stakeholders and the public 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. The Projects will report at least annually to stakeholders, but often will report more frequently during particularly active periods, when the public may experience more impacts or when phases are changing.

In addition to preliminary consultations that took place in December 2021, more in-depth stakeholder engagement activities, using the techniques described above in the chart, will be conducted prior to appraisal (by May 2022). This SEP will then be updated accordingly.

5.5 STAKEHOLDER ENGAGEMENT PLAN

Stakeholder engagement is an inclusive process that must be conducted throughout the project cycle. The table below presents key stakeholders' engagement activities to take place during the project preparation stage through to implementation and closure. Additional activities can be included following consultations with project beneficiaries, stakeholders, and contractors if these are deemed useful and necessary.

In case of stakeholder consultation "events" (whether virtual and in face-to-face meetings), the MoSD will strive to provide relevant information to stakeholders with enough advance notice (two weeks) so that the stakeholders have enough time to prepare to provide meaningful feedback.

The MoSD will gather written and oral comments, review them and report back to stakeholders on how those comments were incorporated, and if not, provide the rationale within 10-15 working days from the stakeholder consultation event. All consultation events will be widened in terms of outreach through the opportunity to use on-line feedback through the platform.

Table 5-2 Stakeholder Engagement Plan

Project component	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Time-table/location/dates
Project Preparation Phase					
All	Proposed project components	All	<ul style="list-style-type: none"> Issues with current status; proposed project improvements accessibility and mobility in the project area 	<ul style="list-style-type: none"> Focus groups Meetings One on one interviews Virtual and physical workshops public hearings; 	Prior to project appraisal
All	Stakeholder consultation on all draft documents: ESMF SEP ESCP	All	<p>Disclosure of the documents</p> <p>Enabling key stakeholders to provide their opinion, feedback, suggestions on the technical, environmental and social assessments.</p> <p>Integrate and address raised suggestions, opinions and considerations in the assessments.</p>	Administration of an Electronic Questionnaire, Emails, letters to stakeholders with appropriate background information and SEP,	<p>As soon as each individual deliverable is completed/ the documents are elaborated</p> <p>The documents will be available for comments for a period of two weeks.</p>
Project Implementation Phase					
Component 1: Developing efficient and responsive safety net delivery systems:					
Sub-component 1a. <i>Expanding the use of digital payments</i>	<ul style="list-style-type: none"> IT system updating using expert consultants, and investments in IT. moving from cash payments to digital payments for the main social grant programs. 	<ul style="list-style-type: none"> social grant programs. payment service providers 	<ul style="list-style-type: none"> Efficiency in the disbursement of funds. reducing of administrative costs of social grants women's economic and financial inclusion 	Emails, letters used to provide background information; Workshops; Public meetings;	Quarterly
Sub-component 1b. <i>Enhancing the NISSA social registry for pro-poor targeting of social assistance.</i>	<ul style="list-style-type: none"> usefulness of NISSA for more programs. updating the NISSA database with fresh information. decentralize the use of the NISSA system to all the 10 districts 	Districts Poor and disadvantaged beneficiaries	<ul style="list-style-type: none"> Linking of Social work with health and other sectors accessibility of social registries 	Emails, letters used to provide background information; Workshops; Public meetings;	Quarterly

Project component	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Time-table/location/dates
Sub-component 1c. <i>Enhancing management information systems, building interoperability, and links to National ID</i>	<ul style="list-style-type: none"> upgrading of the information systems Linking (NICR) national ID numbers to MoSD database. GBV/SEA in the establishment and operation of integrated systems 	<ul style="list-style-type: none"> social grant programs. payment service providers. MoSD staff 	<ul style="list-style-type: none"> collaboration, and integration of systems. Linking social grant programs to national ID numbers. coordinating service delivery for the poorest across other ministries enrolment of social grant beneficiary children in school generation of E-Waste as system is expanded 	Surveys, Public meetings	Quarterly
Component 2: Contingency finance for emergency cash transfers:					
Provision of flexible resources to support temporary expansions of selected social grant programs in response to shocks.	<ul style="list-style-type: none"> temporary expansions of selected social grant programs ability to continue building resilience during shocks 	<ul style="list-style-type: none"> stressed poor households. Beneficiaries 	<ul style="list-style-type: none"> Meeting the emergency needs of the beneficiaries during periods of shock. alleviating stress on poor households cushioning against negative coping mechanisms or hunger 	Reports Public hearings/ Press releases; project website/ Platform	
Component 3: Strengthening beneficiary livelihoods with cash transfer accompanying measures “cash plus”.					
Support for the government in implementing a package of accompanying measures (“cash plus”) designed to strengthen the livelihoods of existing social assistance beneficiaries	Implementation of a package of accompanying measures (“cash plus”)	<ul style="list-style-type: none"> Community Councils cash transfer beneficiaries beneficiary households women’s empowerment 	<ul style="list-style-type: none"> constraints to employment, increased income, and the diversification of income sources. Linkages to: LNHSSP Nutrition Training and SADP Climate smart agriculture 	Emails, letters used to provide background information; Workshops; Public meetings;	Quarterly
a) A productive grant	<ul style="list-style-type: none"> Income generation 	beneficiary investing into a business	<ul style="list-style-type: none"> women’s economic activities strengthening of beneficiaries Livelihoods. 	Reports Public hearings/ Press releases; project website/ Platform	Quarterly

Project component	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Time-table/location/dates
b) Training, group formation and mentorship	<ul style="list-style-type: none"> Effectiveness of financial literacy training Acquisition of life skills 	Beneficiaries women's empowerment	<ul style="list-style-type: none"> Level of financial literacy of beneficiaries. Specific investments with good returns Nutrition status of project beneficiaries 	Reports Public hearings/ Press releases; project website/ Platform	Quarterly
c) Financial inclusion and savings	<ul style="list-style-type: none"> peer-to-peer village savings cushion against shocks 	beneficiaries	<ul style="list-style-type: none"> risk management in the event of shocks borrowing in support of livelihood investments 	Surveys, Public meetings	Quarterly
d) Health services	<ul style="list-style-type: none"> support groups adequately providing health and nutrition education Referral of beneficiary households services provided in the primary health care facilities at the community level 	<ul style="list-style-type: none"> beneficiary households. Mothers 	<ul style="list-style-type: none"> Children's health status. Nutrition status of project beneficiaries. mother's support groups adequately providing health and nutrition education, Better service delivery by VHW 	Reports Public hearings/ Press releases; project website/ Platform	Quarterly
e) Disability inclusiveness	<ul style="list-style-type: none"> Disability, Gender and Youth Inclusion Social inclusion of the disadvantaged children Positive impact of assistive devices. 	children with disabilities	Provision of assistive devices	Surveys, Public meetings,	Quarterly reviews
Component 4: Project management, M&E and capacity building.					
Support implementation of components 1- 3: <ul style="list-style-type: none"> a small Project Facilitation Unit (PFU), assessments, evaluations, technical assistance, and capacity building. 	Overall project implementation	All	Present project implementation report; report on ESF documentation and grievances	Reports Public hearings/ Press releases; project website/ Platform	Annually

5.6 PROTECTION AGAINST COVID-19

Protection against possible risks will include:

- i) Provision and maintenance of procedures of work that are safe and without risks to health (including social distancing and access to hand washing facilities);
- ii) Arrangements for ensuring safety and absence of risks to COVID-19 in connection with the use, handling, storage and transportation of project materials;
- iii) Provision of such information, instructions, training and supervision as is necessary on COVID-19 to ensure the safety and health at work of every person engaged in project activities;
- iv) Informing all persons engaged in project activities of imminent risk and appropriate recourse measures;
- v) Ensuring that every person engaged in project activities participates in the application and review of safety and health measures;
- vi) Ensuring that all workers have adequate and updated information on COVID-19; and
- vii) Establishing measures and a referral pathway if any worker is infected with COVID-19 including establishing linkages with the Ministry of Health (MoH).

5.7 PROPOSED STRATEGY FOR INFORMATION DISCLOSURE

Information and data that will be shared will be information about the project description that will include among many other issues, the project background, the theory of change and the summarized presentation of each of the project components and subcomponents. The projects beneficiary's selection will also be outlined. This information will largely be shared at the early stages of the project.

This will be presented in document format to the district offices who will in-turn present it to lower levels, i.e., the beneficiaries. These documents will also be published in the Government of Lesotho website as well as the Ministry of Social development website. There will also be presentations and discussions over scheduled radio and television platforms where Ministry Officials responsible for implementation, management and coordination of project activities will make presentations about the project as well as the progress update while engaging with the public and answering any arising questions.

The Ministry will also use the platforms below to reach more stakeholders who do not have easy access to information:

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

The strategy will also include means to consult with project-affected stakeholders if there are significant changes to the project resulting in additional risks and impacts. The most critical aspect of the strategy is the leveraging of village level leadership engagement and coordination with the District Administrator's Offices. Table 5.3 below is an outline of the Information Disclosure Plan.

Table 5-3 Information Disclosure Plan

PROJECT COMPONENT	LIST/ TYPE OF INFORMATION TO BE DISCLOSED	METHODS OF DISCLOSURE PROPOSED	TIMING/FREQUENCY	TARGET STAKEHOLDERS	RESPONSIBLE STAKEHOLDERS
All	Proposed Project Design	MoSD/PMU webpage Public consultations Online Platform	Before project appraisal	All	MoSD MoSD-PMU World Bank team
All	ESF documentation that is required for disclosure by the WB ESMF SEP ESCP	MoSD/PMU webpage/Online Platform WB Info shop	As soon as each individual deliverable is completed	All	MoSD MoSD/PMU World Bank team
All	GRM GBV/SEA Action plan E- waste management plan	Public consultations Online Platform MoSD/PMU webpage	During the project (continuous)	All	MoSD MoSD/PMU World Bank team Contractors and Subcontractors
Project Implementation Phase					
Component 1: Developing efficient and responsive safety net delivery systems:					
Sub-component 1a. <i>Expanding the use of digital payments</i>	Public outreach and communications consultancy.	<ul style="list-style-type: none"> • Post on the MoSD, MoSD-PMU project website/ online Platform will include downloadable links for documents • Leaflets • Information boards • Online platform 	After completion of specific documents	General public	MoSD, MoSD-PMU
Sub-component 1b. <i>Enhancing the NISSA social registry for pro-poor targeting of social assistance.</i>	<ul style="list-style-type: none"> • Public outreach and communications consultancy. • NISSA updating and decentralising. 	Post on the MoSD, MoSD-PMU project website/ online Platform Internal newsletters.	During the project.	<ul style="list-style-type: none"> • Government Departments • General public 	MoSD, MoSD-PMU
Sub-component 1c. <i>Enhancing management information systems, building interoperability, and links to National ID</i>	<ul style="list-style-type: none"> • Public outreach and communications consultancy. • NISSA updating and decentralising. 	Post on the MoSD, MoSD-PMU project website/ online Platform Internal newsletters.	During the project.	<ul style="list-style-type: none"> • Government Departments • General public 	MoSD, MoSD-PMU
Component 2: Contingency finance for emergency cash transfers:					
Provision of flexible resources to support temporary expansions of selected social	<ul style="list-style-type: none"> • Budgetary requirements • Public outreach and communications consultancy. 	<ul style="list-style-type: none"> • Post in the local papers the existence and availability of such a facility • Post on the MoSD, MoSD-PMU project 	When resources become available.	<ul style="list-style-type: none"> • Government Departments • Local NGOs 	MoSD, MoSD-PMU

PROJECT COMPONENT	LIST/ TYPE OF INFORMATION TO BE DISCLOSED	METHODS OF DISCLOSURE PROPOSED	TIMING/FREQUENCY	TARGET STAKEHOLDERS	RESPONSIBLE STAKEHOLDERS
grant programs in response to shocks.	•	website		• General public	
Component 3: Strengthening beneficiary livelihoods with cash transfer accompanying measures “cash plus”.					
Support for the government in implementing a package of accompanying measures (“cash plus”) designed to strengthen the livelihoods of existing social assistance beneficiaries	<ul style="list-style-type: none"> • Potential accompanying measures • 	<ul style="list-style-type: none"> • Post in the local papers the existence and availability of such a facility • Post on the MoSD, MoSD-PMU project website • Leaflets • Information boards • Online platform 	During the project implementation	<ul style="list-style-type: none"> • existing social assistance beneficiaries • Community Councils 	MoSD, MoSD-PMU
A productive grant	<ul style="list-style-type: none"> • Business investments • Women in business 	<ul style="list-style-type: none"> • Post in the local papers the existence and availability of such a facility • Post on the MoSD, MoSD-PMU project website • Leaflets • Information boards • Online platform 	During the project.	General public	MoSD, MoSD-PMU
Training, group formation and mentorship	<ul style="list-style-type: none"> • Group dynamics • financial literacy training • Acquisition of life skills 	<ul style="list-style-type: none"> • Post in the local papers the existence and availability of such a facility • Post on the MoSD, MoSD-PMU project website • Leaflets • Information boards • Online platform 	During the project.	General public	MoSD, MoSD-PMU
Financial inclusion and savings	<ul style="list-style-type: none"> • peer-to-peer village savings • cushion against shocks 	<ul style="list-style-type: none"> • Post in the local papers the existence and availability of such a facility • Post on the MoSD, MoSD-PMU project website • Leaflets • Information boards • Online platform 	During the project.	General public	MoSD, MoSD-PMU
Health services	<ul style="list-style-type: none"> • health and nutrition education • Referral Facility 	<ul style="list-style-type: none"> • Post in the local papers the existence and availability of such a facility • Post on the MoSD, MoSD-PMU project website • Leaflets 	During the project.	General public	MoSD, MoSD-PMU MoH

PROJECT COMPONENT	LIST/ TYPE OF INFORMATION TO BE DISCLOSED	METHODS OF DISCLOSURE PROPOSED	TIMING/FREQUENCY	TARGET STAKEHOLDERS	RESPONSIBLE STAKEHOLDERS
		<ul style="list-style-type: none"> Information boards Online platform 			
Disability inclusiveness	<ul style="list-style-type: none"> Assistive Devices. Social inclusion of the disadvantaged children 	<ul style="list-style-type: none"> Public Meetings Post in the local papers the existence and availability of such a facility Post on the MoSD, MoSD-PMU project website Leaflets Information boards Online platform 	During the project.	General public	MoSD,
Component 4: Project management, M&E and capacity building.					
Support implementation of components 1- 3: <ul style="list-style-type: none"> a small Project Facilitation Unit (PFU), assessments, evaluations, technical assistance, and capacity building. 	Publish annual implementation reports, including implementation of SEP and other relevant ESF documentation	<ul style="list-style-type: none"> Post on the MoSD, MoSD-PMU project website/ online Platform will include downloadable links for documents Information boards Online platform 	Annually	All	MoSD, MoSD-PMU

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTATION

6.1 RESOURCES

The cost of the stakeholder engagement activities can be benchmarked with those undertaken in similar projects under the Ministry of Education and Training; the “Lesotho Education Quality for Equality Project” and the “Lesotho Basic Education Improvement Project” in terms of cost estimation. This rationale therefore brings an estimated cost of about US \$ 200,000.00 which will be allocated from the overall project allotment. However, the design and implementation of a **detailed and accurate** SEP will be the overall responsibility of the PMU. Other resources to be committed will be organized as such:

- The MoSD Information Office will be in charge of the SEP in liaison with the project development team lead by the department of planning.
- The MoSD is 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 Social Development (MoSD).

6.1.1 Budget

The Project Coordinator will ensure that the PMU has an adequate standing budget allocated towards the Stakeholder Management Programme. Table 7-1 presents a proposed budget which will cover the Stakeholder Engagement processes which include:

- Buy-in process for all relevant stakeholders to be part of the whole process.
- Development of a stakeholders engagement process that provides stakeholders with an opportunity to influence project,
- Establish formal grievance redress mechanisms disclosure,
- Define roles and responsibilities for the implementation of the SEP,

Table 6-1 Stakeholder Engagement Activities

No.	ENGAGEMENT ACTIVITY	COST ESTIMATION	ESTIMATED COST (US \$)
1.0	Stakeholder Identification and Analysis <ul style="list-style-type: none"> • Conduct a comprehensive participatory stakeholder mapping exercise including roles and responsibilities at national, provincial, district and local area level. • Conduct adequate situational assessment to determine different vulnerability dimensions. 	<ul style="list-style-type: none"> • Stakeholder Participation/consultation exercises including field visits to Beneficiary sites. • Lump Sum for all District for over the entire project period to cover travel costs, allowances, w/shops, etc Venue: all districts Length: continuous Total Cost: \$ 25,000.00	25,000.00
	Stakeholder Participation <ul style="list-style-type: none"> • Conduct workshops to engage the identified stakeholders 	<ul style="list-style-type: none"> • Stakeholder Engagement Workshops • Information Disclosure process • gathering feedback from citizens by local NGOs. • One Stop Shop/Citizen Services Outreach Days Venue: all districts Length: continuous Total Cost: \$ 30,000.00	60,000.00
	Establishment and implementation of the GRM <ul style="list-style-type: none"> • Conduct workshops to disseminate the developed GRM • Establish a call centre with a team of social workers 	<ul style="list-style-type: none"> • Stakeholder GRM Workshops to publicize the GRM • call centre establishment & Grievance line. • procedures and training modules Venue: all districts Length: continuous Total Cost: \$ 10,000.00	115,000.00
	Sub-total		200,000.00

6.1.2 Training

The Implementors, target groups and stakeholders who will play a role in the implementation of the SEP must be provided with appropriate training and awareness, in order to assure its successful implementation and monitoring. This is because the implementation of the activities will require inputs, expertise and resources which will be adequately taken care of if the concerned parties are well trained. The groups that will need training at national level will include:

- a) Environmental Officers
- b) PFU staff
- c) MAFS staff
- d) MoSD staff
- e) District environmental officers
- f) District Social officers
- g) District Health officers/VHWs
- h) Social Workers
- i) Other collaborating institutions

Different workshops will be arranged for all these PSLP partners and PMU team. The training workshops will be geared to bring awareness on the project, SEP, GRM as well as other project-specific documents.

The training workshops will be coordinated by the project Environmental and Social Specialist (ESS) based at the MoSD-PMU, who will collaborate with the Ministry of Environment Officers and Consultants.

6.2 RESPONSIBILITIES

The management, coordination, and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within PMU, partner ministries, and its Contractors, Sub-contractors, and Consultants. The roles and responsibilities of the organizations are presented below.

The Project Management Unit will be responsible for the preparation and physical implementation of the PSLP Project. This unit will be under the oversight of the Project Coordinator.

The Project Coordinator will work closely with the Environmental and Social Specialist (ESS) to ensure that the SEP is implemented in a successful manner.

Environmental and Social Specialist (ESS) is responsible for the management of project related social and environmental issues. The ESS will oversee all stakeholders' engagement activities regarding the implementation of the GRM as well as other project specific documents. Responsibilities of the ESS include the following:

- Develop, implement and monitor stakeholders engagement plan for the project, GRM and other project specific documents;
- Liaise with the Project Coordinator to ensure that stakeholders engagement requirements are understood,
- Maintain the stakeholder database (Appendix 1) ; and
- Proactively identify stakeholders, project risks and opportunities and inform Project Coordinator to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.

7. GRIEVANCE MECHANISM

7.1 INTRODUCTION

For the purposes of these Operational Guidelines, a Grievance Redress Mechanism is a process for receiving, evaluating, and addressing project-related complaints from citizens and affected communities at the level of the project. The terms 'grievance' and 'complaint' are used interchangeably.

Transparency and accountability are core elements of the Project. For this purpose, the project will include a Grievance Redress Mechanism (GRM). 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. The GRM is a mechanism that allows for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve project impact.

The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

The GRM procedures will be improved further by appraisal (May 2022) 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.

7.2 OBJECTIVE OF THE GRM MECHANISM

Addressing grievances raised by individual affected by World Bank-funded projects is an important component of managing project risks and for mitigation strategies. The GRM can serve as an effective tool for early identification, assessment and resolution of grievances and therefore for strengthening accountability to beneficiaries. The GRM is an important feedback mechanism that can improve project impact and respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. With restrictions on movement, it is important that, where possible, staff managing grievances can access systems and work remotely to enable processes to work effectively.

The SEP will keep the local communities and other stakeholders informed about the project's activities, to specifically address GBV/SEA related issues. The grievance mechanism for project workers required under ESS2 will be provided separately.

7.3 GRM SCOPE AND USE

SCOPE: Grievance Redress Mechanism will be available for project stakeholders and other interested parties to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

GRM's users: Project beneficiaries, project affected people (i.e., those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader citizenry can use the GRM for the above purposes (see Scope).

GRM's management: The GRM is managed by the PMUs, under the direct responsibility of MoSD.

Submission of complaints: Complaints can be expressed at any time throughout project implementation.

7.4 PROCEDURES

7.4.1 Channels to make complaints

PSLP establishes the following channels through which citizens/beneficiaries/Project Affected Persons (PAPs) can make complaints regarding project-funded activities:

- a. By Email: tmaphomane@gmail.com
- b. Through the following web page <https://www.gov.ls/>, <https://www.socialdevelopment.org.ls/>
- c. In writing to MoSD : Ministry of Social Development, Pension Fund House Floor 2 & 3, Constitution Rd, Private bag A222 Maseru, Lesotho.

The project shall ensure flexibility in the channels available for complaints, as well as ensure accessibility to the contact information for individuals who make complaints.

7.4.2 Receipt and recording of complaints.

The person receiving the complaint will complete a grievance form (Appendix 3) and will record the complaint in the Register of Complaints, kept under GRM manager. Then, the complaint is to be submitted immediately to the tracking system for sorting and redirecting to the appropriate department responsible for investigating and addressing the complaint, or to staff if the complaint is related to a specific project activity. The Project Coordinator is responsible for determining who to direct the complaint to, whether a complaint requires an investigation (or not), and the timeframe to respond to it.

When determining who will be the investigating officer, the Project Coordinator should ensure that there is no conflict of interest, i.e., all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.

Once the investigation process has been established, the person responsible for managing the GRM records and enters this data into the Register of Complaints.

The number and type of suggestions and questions should also be recorded and reported so that they can be analysed to improve project communications.

7.4.3 Review of the Complaints/Inquiries

The person responsible for investigating the complaint will gather facts in order to generate a clear picture of the circumstances surrounding the grievance. The investigation/follow-up can include site visits, review of documents and a meeting with those who could resolve the issue.

The results of investigation and the proposed response to the complainant will be presented for consideration to the PMU E&S staff, who will jointly with PMU coordinator decide on the course of action. Once a decision has been made and the complainant informed, the investigating specialist describes the actions to be taken in the grievance form (Appendix 3), along with the details of the investigation and the findings, and submits the response to the Directors for signing.

7.4.4 Response to complainant

The complainant will be informed about the results of verification via letter, email or by post, as received. The response shall be based on the materials of the investigation and, if appropriate, shall contain references to the national legislation.

The deadline for investigating the complaint may be extended by 30 working days by the PMU, and the complainant is to be informed about this fact, whether:

- additional consultations are needed to provide response to the complaint,
- the complaint refers to a complex volume of information and it is necessary to study additional materials for the response.

7.5 AWARENESS BUILDING

7.5.1 Information provided in an accessible format

Information about the Grievance Redress Mechanism will be available at the <https://www.gov.ls/>, <https://www.socialdevelopment.org.ls/> website will be included in communications with stakeholders.

7.6 STAFFING AND CAPACITY BUILDING

7.6.1 Tasks and responsibilities of the PMU team on the GRM

The MoSD will allocate responsibilities to the PMU E&S staff. These will be documented in the Project Operations Manual and kept updated:

- Overall management of the GRM system,
- Developing and maintaining awareness-building,
- Collection of complaints,
- Recording complaints,
- Notification to the complainant on the receipt and timeline to review a complaint,
- Sorting/categorization of complaints,
- Thorough examination of the issues, including the causal link between project activities and alleged damage/harm/nuisance,
- Decision-making based on such examination,
- Processing appeals or continuous communication with complainants with the purpose to resolve issues amicably,
- Publishing responses to complaints, unless otherwise is requested by complainants due to privacy or other concerns,
- Organization and implementation of information materials and awareness campaigns,
- Reporting and feedback on GRM results.

7.7 TRANSPARENCY, MONITORING, AND REPORTING

7.7.1 Transparency

Policies, procedures and regular updates on the GRM system, the complaints made and resolved, will be available on the <https://www.gov.ls/>, <https://www.socialdevelopment.org.ls/> web page. They will be updated quarterly.

7.7.2 Regular internal monitoring and reporting

The Directors will assess quarterly the functioning of the GRM in order to:

- Provide a monthly/quarterly snapshot of GRM results, including any suggestions and questions, to the project team and the management.

- Review the status of complaints to track which are not yet resolved and suggest any needed remedial action.

During quarterly PMU meetings, the project team shall discuss and review the effectiveness and use of the GRM and gather suggestions on how to improve it.

7.7.3 Reporting in half-yearly and annual progress reports submitted to the World Bank

In the semi-annual project implementation reports submitted to the Bank, PSLP shall include a GRM section, which provides updated information on the following:

- Status of establishment of the GRM (procedures, staffing, awareness building, etc.),
- Quantitative data on the number of complaints received, the number that were relevant, and the number resolved,
- Qualitative data on the type of complaints and answers provided issues that are unresolved,
- Time taken to resolve complaints,
- Number of grievances resolved at the lowest level, raised to higher levels,
- Any issues faced with the procedures/staffing or use,
- Factors that may be affecting the use of the GRM/beneficiary feedback system,
- Any corrective measures adopted.

8. MONITORING AND REPORTING

8.1 INVOLVEMENT OF STAKEHOLDERS IN MONITORING ACTIVITIES

Monitoring and evaluation of the SEP process is vital as it ensures that the PMU can respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. As part of the SEP, a mechanism for providing feedback to the stakeholders on their information needs will be set up. In addition, the SEP will include means for monitoring the effectiveness of the public consultation processes and outcomes from consultations, and for determining where further action may be necessary regarding engagement. Adherence to the following characteristics/commitments/activities will assist in achieving successful engagement:

- Sufficient resources to undertake the engagement,
- Inclusivity (inclusion of key groups) of interactions with stakeholders,
- Promotion of stakeholder involvement,
- Sense of trust in PMU shown by all stakeholders,
- Clearly defined approaches, and
- Transparency in all activities.

The environmental and social specialist (ESS) in the PMU will be responsible to ensure that the SEP is implemented throughout the life of the project. The ESS will also be responsible for communicating and reporting on all stakeholder matters to the Project Director.

Further, monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluates the process undertaken.

Two distinct but related monitoring activities in terms of timing will be implemented:

- During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- Following completion of all engagement activities: a review of outputs at the end of the engagement to evaluate the effectiveness of the SEP as implemented.

A series of key performance indicators for each stakeholder engagement stage have been developed. Table 5 shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Table 8-1 Key Performance Indicators by Project Phase

No.	PHASE ACTIVITIES	ACTIVITIES	INDICATORS
1.0	Planning for Project	Share updates on Project activities	Posters displayed in allocated service centres by the time specified
2.0	GRM, SEP, and other project-specific documents Implementation	Share updates on SEP, GRM and other project specific documents activities	<ul style="list-style-type: none"> • Posters displayed in allocated service centres by time specified; • Affected community stakeholders will have received and understand the information disclosed and attended the public meetings; • Communities provided feedback; • No complaints about non-receipt of project specific documents received.

The identification of PSLP related impacts and concerns is a key element of stakeholder engagement that will occur over the complete PSLP life cycle. As such, the identification of new concerns, impacts and grievances as the GRM and PSLP progress will serve as an overall indicator for the implementation of the stakeholder engagement process.

During the PSLP implementation there will be a review of the engagement activities conducted; levels of stakeholder involvement; the issues discussed and outcomes; and the extent to which stakeholder issues, priorities, and concerns are reflected in the SEP as well as other project-specific documents.

8.2 REVIEW OF ENGAGEMENT ACTIVITIES IN THE FIELD

During the engagements with stakeholders the engagement team will assess meetings using the following engagement tools:

- Stakeholders database (Appendix 1);
- Issue and Response table (Appendix 2); and
- Meeting records of all consultations held.

8.3 REPORTING STAKEHOLDERS' ENGAGEMENT ACTIVITIES

Performance will be reviewed following the stakeholders' engagement sessions conducted in the field. In assessing performance, the following will be considered:

- Materials disseminated: Types, frequency, and location,
- Place and time of formal engagement events and level of participation including specific stakeholders groups e.g., Chiefs,
- Number of people attending public or formal meetings,
- Number of comments received a type of stakeholder and detail of feedback provided;
- Meeting minutes, attendance register and photographic evidence,
- Numbers and type of stakeholders who meet the PSLP project Team by mail, telephone, and any other means of communication,
- Comments received by government authorities, community leaders, and other project partners and passed to the PSLP; and
- Number and types of feedback and/or grievances and the nature and timing of their resolution; and the extent to which feedback and comments have been addressed and have led to corrective actions being implemented.

9. APPENDICES

APPENDIX 1. STAKEHOLDER'S DATABASE

PATHWAYS TO SUSTAINABLE LIVELIHOODS PROJECT (PSLP)

NO.	Name & Surname	Department	Designation	Email Address	Phone No.	Signature
1						
2						
3						
4						
5						

APPENDIX 2. ISSUE AND RESPONSE TABLE

Issue	Sub Issue as Perceived by Potentially Affected Populations	Questions/Comments from Stakeholders	Response/Feedback

APPENDIX 3. GRIEVANCE REGISTER FORM.

Grievance Register Form

Project Grievance Register Template														
Identifiers			About the PAP				About the Complaint			Method of Resolution	Escalation	Notes		
ID	Date received	Date closed	Name & Surname	District	School name	Stakeholder (employee, parent, community)	Reporting method (F2F, suggestion box, online, social media, email, in writing, feedback forms)	Type of grievance (administrative or operational)	Root cause of the grievance (see also Explanations tab and List of Root Causes)	Outcome	If a resolution was offered please indicate 'accepted' or 'not accepted'.	Methods of resolution (optional) e.g.: negotiated, mediated, apology	Escalation of grievance (e.g., school board, LEQEP PMU)	

Explanations of fields in the Grievance Register

Type of grievance (please indicate 'administrative' or 'operational')	Please indicate whether the grievance was classified as 'administrative' or 'operational' in nature, according to the Complaints and Grievances Procedures.
Service provider	Government or private
Root cause of the grievance (if possible, please choose cause from list under the Explanations tab)	Please name the process or type of decision that was the root cause of the grievance.
Escalation of grievance (i.e.: School board, PMU)	Please indicate if you are aware of the stakeholder pursuing the matter further through other avenues outside the PMU. If not known, indicate 'unknown'. The timelines for external reviews can be lengthy in many cases. Information in this column will only reflect what is known at the time of reporting, either via notification by the external body or stakeholder.

APPENDIX 4 STAKEHOLDER ENGAGEMENT PROCESS

This appendix contains the details of the field consultations that were conducted in the process of developing the PSLP E&S Safeguards instruments.

APP 4.1 Minutes of PSLP Stakeholder's engagement Meeting:

The following is an outline of the Public Consultation meeting that was held on the

i) In Attendance:

Table APP 4.1 List of Consulted Stakeholders.

No.	MEETING DATE	NAME	ORGANIZATION	DESIGNATION	Contact No. & Email Address
2.1.1	05/03/21				
2.1.2	05/03/21				
2.1.3	05/03/21				
2.1.4	05/03/21				
2.1.5	05/03/21				
2.1.6	05/03/21				

ii) Chronology of events

1. Introductions
2. Introduction to PSLP, Rationale and background to the project and its Components
3. Overview of the ESMF and its implications on the project
4. Review and summary discussions of the issues to consider and social and environmental needs and the shared tool.
5. Way forward