Sierra Leone

Free Education Project

Stakeholder Engagement Plan (SEP)

Ministry of Basic and Senior Secondary Education

August 20, 2020

Stakeholder Engagement Plan (SEP)

Table of Contents

ABBREVIATIONS AND ACRONYMS

ASC	Annual School Census
CBO	Community-Based Organization
CERC	Contingent Emergency Response Component
CoP	Communities of Practice
EMIS	Education Management Information System
EPA	Environmental Protection Agency
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESP	Education Sector Plan
ESRS	Environmental and Social Review Summary
GBV	Gender-based Violence
GRM	Grievance Redress Mechanisms
GRS	Grievance Redress Service
HCI	Human Capital Index
IDA	International Development Association
IPF	Investment Project Financing
JSS	Junior Secondary School
LC	Local Council
M&E	Monitoring and Evaluation
MBSSE	Ministry of Basic and Senior Secondary Education
MIS	Management Information System
MoF	Ministry of Finance
NDP	National Development Plan
PFMU	Project Fiduciary Management Unit
PIU	Project Implementation Unit
REDiSL	Revitalizing Education Development in Sierra Leone
SBM	School-based Management
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SGBV	Sexual and Gender-based Violence
SMC	School Management Committee
SSS	Senior Secondary School
TSC	Teaching Service Commission
TTI	Teacher Training Institution
WAEC	West African Examinations Council

1. INTRODUCTION

1.   The Free Education (FREE) Project, which is a five-year International Development Association (IDA)-funded project supported with a US$50 million credit, was approved by the Board on June 29, 2020. The project's main implementing agency is the Ministry of Basic and Senior Secondary Education (MBSSE). Activities supported under the proposed project would aim to address school- and system-level challenges facing the education sector building on successful activities and approaches supported under the Revitalizing Education Development in Sierra Leone (REDiSL) Project and existing research on effective approaches in Sierra Leone and in other settings. The project will be implemented at a time when the education system is facing a new crisis worldwide with the spread of COVID-19. The COVID-19 pandemic threatens education outcomes through two main channels: (a) the immediate impact of school closures on learning, especially of the most vulnerable who do not have stimulating environments at home and in the community, lack proper nutrition, and cannot access distance learning, and (b) the short-, medium- and long-run impacts of fiscal constraints and potential economic recession sparked by the pandemic. In combination, COVID-19 poses the risk of reversing the gains made towards universal education and quality learning in particular for vulnerable groups.

2.   The SEP is updated to reflect the AF interventions. The SEP for the parent project -SL FREE Education Project - was already approved and disclosed on June 7, 2019 both on the Bank's and client's websites. The original SEP is now updated to include additional activities to be financed through AF from the GPE COVID-19 grant in the amount of US$6.85 million to finance a COVID-19 Education Response intervention as a sixth component. The Bank is supporting COVID-19 and Response Project in Sierra Leone. The component financed by the AF will explore synergy between and coordinate with Bank financed COVID-19 Emergency Preparedness and Response Project.

3.   The project will be co-financed from a US$6.85 million Global Partnership for Education (GPE) COVID-19 grant to support the COVID-19 Coordinated Education Response and Recovery Plan for continued learning, recovery, and resilience in the education sector. The proposed AF is well aligned with the parent project and as such there are no proposed changes to the PDO.   The PDOs of the FREE Project are to improve the management of the education system, teaching practices, and learning conditions. The GPE grant will be processed as an Additional Financing to the Project.

4.   The FREE project consists of the following components:
        Component 1: Policy, Governance, Accountability, and System Administration
        Component 2: Teacher Management and Professional Development
        Component 3: School Level Education Development
        Component 4: Project Management, Coordination, and Monitoring and Evaluation
        Component 5: Contingent Emergency Response Component (CERC)

5.   A sixth component: COVID-19 Education Response (Estimated project financing: US$6.85 million) will be added to the FREE Project. It will comprise the following Subcomponents:

   a.   Strategic Communications (Estimated project financing: US$0.76 million)
   b.   Continuous Distance Education Service Delivery (Estimated project financing: US$2.89 million)
   c.   Safe School Reopening, and Health and Safety of Students including the Most Vulnerable (Estimated project financing: US$2.51 million)

d. Effective Operations, Planning and Policy during and after the COVID-19 Crisis (Estimated project financing: US$0.69 million)

6.   The design of Component 6 is responsive to strategies articulated in the MBSSE's Education Sector COVID-19 Response Plan as well as the information and communication strategy challenges flagged by Social Development Global Practice note on COVID-19 Country Social Impact for Sierra Leone. The proposed project will ensure strategic communications. MBSSE started the nation-wide distance education service delivery through radio transmission one week after the school closure due to COVID-19. The proposed project will strengthen the continuous distance education service delivery by updating its contents, diversifying mode of delivery, and improving the quality of service delivery. Radio online and TV programming for basic education, will include closed captioning and sign language embedded (whenever possible). Printed educational packets will include stationery, writing implements, braille learning packets for visual impaired learners, Large font learning materials. Project will also explore the use of special education teachers in private schools to provide remote support to learners with disabilities and their families- ranging from phone check-ins to providing remote support to parents It will also support safe school reopening, and health and safety of students including the most vulnerable. Lastly, the proposed project will support sustaining effective Government's operations, planning and policy during and after the COVID-19 Crisis.

7.   The project is well-aligned with Government and World Bank priorities and strategies focusing on addressing education sector challenges and transforming the education system in the long-term. Its primary objective is to increase the number of children in schools with improved learning conditions and better teaching practices and to strengthen system accountability. In the context of the COVID-19 pandemic, the added component is to support the COVID-19 Response and Recovery Plan for continued learning, recovery, and resilience in the education sector. The project's main implementing agency is the Ministry of Basic and Senior Secondary Education (MBSSE) and the project will be implemented using the World Bank's Environmental and Social Framework (ESF). Given the context, the provisions of the ESF will be complemented by the Bank's Guidance Notes related to Bank Operations during COVID-19 including the Technical Note on *Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings* and the *Interim Note on COVID-19 Considerations in Construction Works Projects*. The Bank's Environmental and Social Development Specialists prepared an Environmental and Social Review Summary (ESRS) which included information on the type and scope of the proposed project, its potential risks and impacts; and the Environmental and Social Risk Classification (ESRC) which has a preliminary classification as Moderate.

8.   The FREE project will invest in physical infrastructure and has the potential to generate significant opportunities in many ways; improving quality learning outcomes, improving school completion rate, training and capacity building, opportunities for employment, strengthening continuous distance learning, and safe reopening of schools. In line with the government's commitment to inclusive education the project will pay special attention to issues affecting persons with disabilities and other vulnerable social groupings as well as closely monitor the key social issues identified by the initial environmental and social screening such as gender, Sexual exploitation of abuse and harassment (SEA/H), disability inclusion. Further analysis and consultation on these issues should reveal constraints and opportunities to promote equal access to the project related benefits.

2. STAKEHOLDER ENGAGEMENT

9.   The World Bank has a long history of multi-stakeholder engagement and strategies to promote effective project preparation, project implementation and project monitoring, which entails empowering citizens to participate in the development process and integrating citizens' voice in development programs as key accelerators to achieving results. Therefore, the World Bank is committed to mainstreaming stakeholder engagement in operations it supports in order to improve development outcomes.

10.   Stakeholder engagement is defined as the two-way interaction between stakeholders and the government implementing agencies within the scope of the project that gives stakeholders a voice in decision-making with the objective of improving the intermediate and final development outcomes of the intervention (see figure 1). The spectrum of stakeholder engagement includes consultation, collaboration and participation, and integration and responsiveness to stakeholder concerns leading empowerment.

Figure 1. Feedback loops created between government and stakeholders
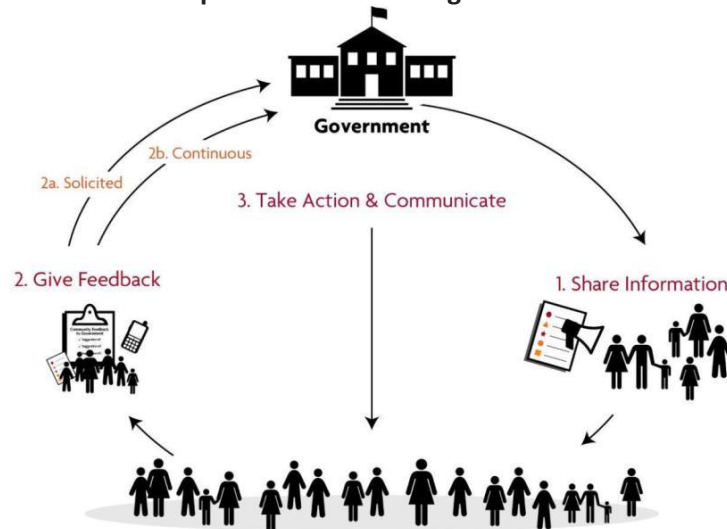
11.   As a part of project preparation, the Government has carried out a Stakeholder Engagement Analysis which was aimed at identifying (i) who will be directly or indirectly affected by the project, (ii) how the project will reach out to stakeholders, and (iii) how would the project share information and get stakeholders involved in the decision-making and implementation of the project. This Stakeholder engagement Plan therefore summarizes findings of the analysis and describes the timing and methods of engagement with stakeholders throughout the life-cycle of the project. The process of preparing the Stakeholder Engagement Plan was inclusive as it was designed to accommodate the needs and circumstances of diverse range of stakeholders, paying special attention to identified disadvantaged or vulnerable individuals or groups with consideration for stakeholders' communication and physical accessibility challenges.

12.   The Government is committed to citizens' and stakeholders' engagement in dialogue. Decision-making, and/or implementation in the education sector. Experience from the recently completed REDiSL Project shows the importance of extensive provision for citizen engagement, including consultations, collaboration, community-driven activities, participatory monitoring, and grievance redressal mechanisms (GRMs) that will be deployed at various stages of the project cycle. The proposed project will build on the gains of the REDiSL and promote citizens' and stakeholders' engagement in dialogue,

decision-making and/or implementation. The project preparation process is being characterized by significant consultation with stakeholders (including various disability organizations, organizations focused on women and girls, and participants from rural areas) for inputs on the selection and design of activities and overall implementation of the proposed project. This Stakeholder Engagement Plan (SEP) will be used to ensure engagement is maintained throughout project implementation to closure. Project activities such as performance-based financing, school infrastructure improvement for existing schools, and school maintenance/renovation grants will be managed by communities/schools using a community-empowered approach. The project will ensure that different voices are heard, including the most vulnerable and those with different forms of disability, gender, and literacy. The project communication strategy and the GRM will serve as a loop for continuous feedback on the project. School management committees (SMCs) and board of governors will be responsible for facilitating dialogue among school stakeholders and decision making at the school level, making information publicly available, developing an implementation plan, and leading the implementation. In addition, the project will support capacity building of communities/SMC members in key areas such as school grants and gender and disability sensitization awareness. As part of Education Emergency Response, the project will support a nationwide communications campaign on public health and safety with regards to COVID-19 and a Back to School campaign engaging students and community stakeholders through interactive radio programs. The MBSSE and partners will actively include community-based organizations, civil society organizations and citizens in policy development through a hybrid of approaches including town halls and the use of technology.

3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

13.   During the project identification and preparation stage, several consultations took place at the national level involving the MBSSE and at the local and school levels involving other agencies and key stakeholders (see table 1).

**Table 1. List of stakeholder Engagement Activities conducted
during the project identification and preparation stage**

Stakeholder	Main topics discussed
MBSSE	• Challenges facing the MBSSE. • Goals/objectives MBSSE wants to achieve. • Strategies to achieve the goals. • Indicators the MBSSE wants to use to measure attainment of the goals (results framework). • Monitoring mechanism for the project. • Implementation arrangement for the project.
MoF	• Alignment of the project with national strategy. • Investment viability of the project. • Sustainability considerations in the project design. • Contribution of the project to the county's economic development, poverty reduction and shared prosperity. • Contribution of the project to enhanced human capital.
PFMU	• Challenges facing the PFMU. • Aspects that need improvement to enhance the operations of PFMU.
Local Government Finance Department (LGFD)	• Educational decentralization work in the country. • Roles and responsibilities devolved to local level.

Stakeholder	Main topics discussed
TSC	• Challenges the TSC is facing. • Goals/objectives TSC wants to achieve. • Strategies to achieve the goals. • Strategies to improve teacher management and teacher Deployment. • Functions and operations of TSC (human resources, budget, annual plan, activities).
WAEC	• Challenges the WAEC is facing. • Goals/objectives WAEC wants to achieve. • Strategies to achieve the goals. • Strategies to improve quality of examinations. • Functions and operations of WAEC (human resources, budget, annual plan, activities).
Local Councils	• Educational decentralization work in the country. • Roles and responsibilities devolved to local level. • Monitoring of schools by LCs. • How LCs support education activities. • How LCs work with District Education Offices. • Existing Committees at the LCs and district levels. • Budgetary allocations for education at the LCs.
District Education Offices	• Educational decentralization work in the country. • Role of District Education Offices (DEOs). • Interaction between DEOs and schools. • How the DEOs support education activities. • How the DEOs work with LCs. • Existing committees at the district levels.
School heads	• Does SMC function well? • How the performance-based grant work. • Challenges facing schools. • Monitoring visits by inspectors, supervisors, local councils, district education offices, local TSC. • Community support in school management. • Main causes of children's dropout. • Supply of teaching and learning materials (e.g. textbooks) Effects of the Free Quality Education Program on student enrollment. • Does the school charge parents any fees? • Challenges teachers are facing. • Professional development training for teachers. • Issues on gender, GBV and inclusive education. • Actions to take to address GBV, gender, inclusive education.
Teachers and Sierra Leone Teachers' Union	• Challenges facing schools. • Competences and qualifications of teachers. • Monitoring visits by inspectors, supervisors, local councils, district education offices, local TSC. • Community support in school management. • Causes of children's dropout. • Supply of teaching and learning materials (e.g. textbooks).

Stakeholder	Main topics discussed
	• Effects of the Free Quality Education Program on student enrollment. • Does the school charge parents any fees? • Challenges teachers are facing. • Do teachers receive professional development training? • Are there any issues relating to gender, GBV and inclusive education?
Teacher Training Institutions (TTIs)	• Relationship between TTIs and TSC • How do TTIs collaborate with TSC on pre-service teacher training? • Do TTIs and MBSSE/TSC share students teacher information and discuss on teacher management and deployment?
Parents	• Functions and operations of SMC • Presence of PTA in schools • Payment of school fees by parents • Awareness on how the performance-based grant is spent and utilized? • Challenges schools face • Satisfaction by parents with school performance • Sharing information by schools • Community support in school management • Causes of children's dropout. • Issues on gender, GBV and inclusive education
Students	• Access to information. • Information disclosure • Issues of gender, GBV, and inclusive education. • Child labor/forced labor
Communities	• School performance • Access to information • Information disclosure • Issues on gender, GBV and inclusive education
NGOs	• Activities of NGO in education sector • Challenges schools are facing
Development partners (DPs)	• Support provided by DPs in the education sector • Challenges schools are facing • Issues on gender, GBV and inclusive education

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 Target Stakeholders and Other Interested Parties

14.   In this framework, the following people are considered as stakeholders: (i) those who are affected or likely to be affected by the project; (ii) those who may have an interest in the project. Table 2 summarizes affected (target stakeholders) and non-affected parties who may be directly or indirectly affected by the project.

Table 2. List of Potentially Affected Stakeholders and Other Interested Parties

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
Component 1: Policy, Governance, Accountability, and System Administration			
1.1 Evidence-based Education Planning and Rationalization	MBSSE, heads, teachers and SMCs/Board of governors	ESPs and Budgeting, School approval and catchment area, Provision of formula-based school funding, EMIS, Quality assurance	MoF, MoPED, Policy makers, communities, NGOs,
1.2 Strengthening curriculum and assessment framework	MBSSE, WAEC, Headteachers TSC Local Council	Curriculum review, gender and disability, special needs teacher training, Monitoring and evaluation	NGOs MSWGCA SLTU
1.3 Promoting Gender equality and Inclusive Education	MBSSE, Headteachers, Teachers, SMC and Gender, disability advocacy and women rights groups	Capacity building, gender and disabilities visibility, Curriculum diversity, A safe environment from sexual harassment and school based GBV, special needs education, safeguarding policy and referral pathway, strengthen Guidance counselors	Local community, Traditional leaders, Religious leaders, NGOs, Ministry of Social Welfare, Ministry of Gender
Component 2: Teacher Management and Professional Development			
2.1 Strengthening TSC for Teacher Workforce Planning and Teacher Management	TSC	Capacity building Database on teachers	SLTU
	MBSSE	Capacity building Digital Database for recruitment and deployment	MBSSE (MSWFGP) Local Councils, Council of Head Teachers. Conference of Principals of Secondary Schools
2.2 Cluster based continuous professional development	TSC	Provision of the framework for professional development, guidance and review of continuous professional development	Tertiary institutions, TTIs, NGOs
	Teachers	Career development and training	SLTU
	MBSSE	Capacity building Digital Database for recruitment and deployment	
Component 3: School Level Education Development			
3.1 Performance based school financing	MBSSE, heads, teachers and SMCs/Board of governors	Provision of performance-based financing (PBF)	MoF, Policy makers, communities, NGOs

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
3.2 Physical improvement to learning environment	Local contractors	Renovation and construction of schools	Ministry of Lands, Local contractors, Chiefs and local authorities, EPA, Ministry of Works, Ministry of Labor, Ministry of Social Welfare, Gender and children Protection (MSWFGP)
	Heads, teachers, SMCs	Maintenance of infrastructure	
	Local Council, communities	Community engagement Information and communication	
Component 4: Program Management, Coordination and Monitoring and Evaluation			
4.1 Program Management, Coordination Monitoring and Evaluation	MBSSE MoF	Oversight and evaluation capacity building	Local councils
Component 5: CERC			
Component 6: COVID-19 Education Emergency Response			
6.1 Ensuring strategic communications	MBSSE, TSC, Heads, Teachers, primary and secondary school pupils	Distance learning provision, Health and safety, Sensitization communication campaign, School reopening	Communities, NGOs, SLTU
6.2 Strengthening continuous distance education service delivery	TSC, MBSSE	Content development and delivery of a multi-modal distance learning program, online platform and tools	NGOs, parents, radio broadcaster, internet service providers
	Primary and secondary school aged children	User of distance education services; toll-free helpdesk, online tools	
	Students with special needs, girls/children from disadvantaged background	Pre-loaded content devices	
	Teachers	In-service teacher training; toll-free helpdesk, online tools	
	Schools, regional offices	Provision of radio routers and dongles to strengthen internet connection, provision of radios and televisions	
	Communities	Beneficiary of COVID-19 related information, mobile based resources	
6.3 Ensuring safe school reopening, and health and safety of students including the most vulnerable and school staff	MBSSE, Students, Teachers, Staff, Schools	COVID-19 risk and prevention strategies, School Safety Protocol, revision of school academic calendar; WASH supplies; cleaning and	Parents, communities, policy makers, Ministry of Health and Sanitation, National and District Emergency Operation Centers (EOCs),

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
		disinfecting school premises; psychosocial support	NACOVERC, Ministry of Social Welfare, Ministry of Health, (MSWFGP)
6.4 Sustaining effective operations, planning and policy during post COVID-19 crisis	MBSSE, SMC, SLTU	Institutional reform's process, capacity development, development of key policies, effective education service delivery and strengthen resilience of the education system	Students, communities, Local Councils, NGOs

4.2 Potential Roles, Interest, and Influence of Key Stakeholders

15.   Table 3 maps out the potential role, interest and influence in the SEA for each of the stakeholders.

Table 3. Potential Roles, Interest and Influence of Key Stakeholders

Stakeholder	Potential Role of Stakeholder	Interest	Influence
MBSSE	Provides administrative oversight and coordination for project Lead in stakeholder engagement and consultations Lead in complaints and grievance redress	High	High
MoF	Allocate financial resources	High	High
Ministry of Health and Sanitation	Information sharing about COVID-19 Reopening of safe schools and management of schools during and post the COVID-19 period.	High	High
Ministry of Justice	Provides legal advice to project	Low	low
PFMU	Day-to-day Fiduciary coordination of project	High	High
Local Government Finance Department (LGFD)	Disburses funds to SMCs	High	Medium
TSC	Provision of the framework, guidance and review of continuous professional development and distance learning program	High	High
WAEC	Curriculum review and performance assessment standards	Medium	Low
Local Councils	Community engagement Information and communication	High	High
District Education Offices	Curriculum review and performance assessment standards, Supervision	High	High
School heads, Teachers, SMCs	Career development and training, administration of funds and supervision, safe reopening of schools	High	High

Stakeholder	Potential Role of Stakeholder	Interest	Influence
School Pupils/ students	Beneficiaries of Project interventions	High	Low
Local contractors	Renovation and construction of schools	High	Medium
Parents	Quality of teaching and learning, provides access to distance learning program to students	High	Medium
Local community, chiefs	Provision of land, permission from the local authorities and the traditional heads. Community ownership of the project	High	High
NGOs	safeguarding policy and referral pathway strengthen Guidance counselors	Medium	Medium
Media	Dissemination of information in local and national news, distance learning program	High	High
Development partners (DPs)	budgetary support and technical assistance	Medium	High

4.3 Disadvantaged / Vulnerable Individuals or Groups

16. Disadvantaged/vulnerable individuals and groups, who often do not have a voice to express their concerns or understand the impacts of a project, are sometimes excluded from stakeholder engagement. Table 4 shows potential disadvantaged/vulnerable individuals/groups and limitations they may have regarding participating in the consultation process.

Table 4. List of Disadvantaged/Vulnerable Individuals/Groups

Project component	Vulnerable groups and individual	Peculiar Characteristics /Needs	Preferred means of notification/Consultation	Additional Resources Required
Component 1: Policy, Governance, Accountability, and System Administration				
1.1 Evidence-based Education Planning and Rationalization	Local communities, women/Girls, People with disabilities (Disability Commission)	Limited voice, under-represented, lack of access to information	Limited meetings with representative of vulnerable groups following COVID-19 prevention protocols, engagement at the local level including the use of radio, TV, online discussions, and other modern forms of online platforms, town hall meetings will be also used in post-COVID-19 period	Internet access, electronic gadgets, Safe Transportation following COVID-19 protocol
1.2 Strengthening curriculum and	Local communities, Women/Fede	Limited voice, under-represented,	Limited meetings with representative of vulnerable groups	Internet access, electronic gadgets, safe transportation following COVID-19 protocol

Project component	Vulnerable groups and individual	Peculiar Characteristics /Needs	Preferred means of notification/Consultation	Additional Resources Required
assessment framework	ration/Association of Persons with Disability	lack of access to information,	following COVID-19 prevention protocols, engagement at the local level including the use of radio, TV, discussions in online platforms, and other modern forms of communications	
1.3 Promoting Gender equality and Inclusive Education	Women, girls, poor and disadvantaged children pregnant school age girls, visually and hearing impaired	Cultural and traditional barriers, Poverty, stigma, Lack of braille or sign language, language barrier	Limited meetings with representative of women's groups following COVID-19 prevention protocols, use of gender champions, in schools and local community, use of social media including, radio, TV, online platforms	Engagement of local NGOs and CBOs who work with vulnerable people at the community level to help disseminate information and organize consultation, Audio devices, braille, sign languages, translators, infographics, use of social media
Component 2: Teacher Management and Professional Development				
2.1 Strengthening TSC for Teacher Workforce Planning and Teacher Management	Teachers in remote areas, teachers with disabilities, female teachers who may be vulnerable to GBV/SEA	Accessibility, lack of information, limited voice, under-represented in school management and decision making	More information dissemination through the local radio and town criers, posters, local language skits and discussions, and social media platforms such as WhatsApp	Internet access, electronic gadgets, transportation in post-COVID-19 period
2.2 Cluster based continuous professional development	Teachers with physical disabilities (mobility, hearing, and vision impairment)	Accessibility, lack of information and funding for training in special needs	Special training needs such as braille, audio devices, accessible venues	Braille, special training facilitators, sign language translators/interpreters, safe transportation following COVID-19 protocol
Component 3: School Level Education Development				
3.1 Performance-based School Financing	School stakeholders in remote poor rural	Remote Distance, Poor	Limited meetings at community level following COVID-19 prevention protocols,	Transportation with social distancing from rural areas to meeting places following COVID-19 protocol provision of

Project component	Vulnerable groups and individual	Peculiar Characteristics /Needs	Preferred means of notification/Consultation	Additional Resources Required
	areas, women and young people	Communication network, under-represented	community notices, local radio	information on noticeboards, use of social media for information dissemination, internet access, online platform, recruitment of volunteers to disseminate information to remote areas in post-CODIV-19 period
3.2 Physical improvement to Learning Environment	Physically challenged persons with visual and hearing impairment	Lack of access to meeting places, long distance to school infrastructure, meetings Transportation, language barrier, visual impairment, disable and vulnerable group unfriendly classrooms, sanitations and water facilities	Meetings with the Disability Commission, Local/community radio, media, digital communication	Transportation cost for persons with disability to participate in post_COVID-19 period, Information translated to indigenous languages, sign language/ braille Project need to adapt universal design requirement with the objective of providing vulnerable and disadvantage students, teacher and other users with equitable access to schools' facilities
Component 4: Program Management, Coordination and Monitoring and Evaluation				
4.1 Program Management, Coordination and Monitoring and Evaluation	Stakeholders in remote areas	Limited voice, Low representation, Lack of access to information,	Focus group meetings following COVID-19 protocol, engagement at the local level including the use of radio and town hall meetings in post-COVID-19 period	More information dissemination through the local radio and town criers, posters, local language skits and discussions. Community level engagement /consultations rather than at a district headquarters
Component 5: CERC				
Component 6: COVID-19 Education Emergency Response				
6.1 Ensuring strategic communications	Stakeholders in remote areas, persons with disability	Lack of access to communication modality	Engagement at the local level including the use of local radio, social media, and town hall meetings in post-COVID-19 situation	Extend coverage of the MBSSE's radio station to districts with poor receptivity, equip regional and community radio stations with the capacity to manage and implement education programming

Project component	Vulnerable groups and individual	Peculiar Characteristics /Needs	Preferred means of notification/Consultation	Additional Resources Required
6.2 Strengthening continuous distance education service delivery	Children without access to radio (or mobile and internet) or poor radio transmission	Lack of access to radio or other distance learning media	Community notices, community use of radio and other digital technology such as television, mobile, internet	Provision of radio routers, dongles and small generators to schools and regional offices to tap into existing internet connections; provision of radios and televisions within schools; pre-loaded content devices will be provided to disadvantaged groups, mobile-based learning content will be developed
6.3 Ensuring safe school reopening, and health and safety of students including the most vulnerable	Students, girls from lower socioeconomic background at risk of dropout, students with disabilities	Risk of not returning to school, live in deprived communities and overcrowded households	Limited meetings with representative of vulnerable groups following COVID-19 protocol prepared by Ministry of Health and Sanitation, Engagement at the local level including notices in local community noticeboards, the use of radio, social media, other online platforms, and digital communications, town hall meetings in post-COVID-19 period	Community outreach campaign, psychosocial support, COVID-19 spread preventive measures such as disinfection of school premises and supply of necessary equipment such as masks, gloves, disinfectant spray etc.
6.4 Sustaining effective operations, planning and policy during post COVID-19 crisis	Stakeholders in remote areas	Limited voice, Low representation, Lack of access to information	Engagement at the local level including the use of radio and a hybrid platform for online and SMS-based annotation of policies	Online platform, digital communication, power generators in schools in locations with low or disrupted power connection etc.

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1 Purpose and Timing of Stakeholder Engagement Program

17.　　　As set out in ESS10, stakeholder engagement is an inclusive process that must be conducted throughout the project life cycle. Table 5 presents an outline of key stakeholder engagement activities to take place during the project preparation stage through to implementation and closure.

Table 5. Proposed Stakeholder Engagement at Preparation stage

Project component	Target stakeholders	Expected discussion and decisions
Project preparation stage		
1. Policy, Governance, Accountability, and System Administration		
1.1 Evidence-based Education Planning and Rationalization	- MBSSE - School heads	- How annual school census (ASC) is conducted. - What information needs to be captured through (ASC). - How to ensure quality assurance - How EMIS system can be improved.
1.2 Strengthening curriculum and assessment framework	- MBSSE, WAEC - School heads - Teacher Training Colleges	- How curriculum and assessment framework can be improved and be more inclusive. - What capacity building is needed.
1.3 Promoting Gender equality and Inclusive Education	- MBSSE - Schools heads and SMCs - NGOs and DPs	- What gender and disability related issues exist. - How the project can address gender and disability issues during and post-COVID -19 period. - What activities are implemented by other partners.
2. Teacher Management and Professional Development		
2.1 Strengthening TSC for Teacher Workforce Planning and Teacher Management	- TSC - MBSSE	- Issues TSC encounter regarding teacher management and deployment - Incentives for deployment of teachers, especially female teachers to remote areas
2.2 Cluster based continuous professional development	- TSC - Teachers - Teacher Training Colleges	- Strengthening pedagogical skills by TSC. - Effective use of teacher and other teaching aids by teachers - Improvement of teachers teaching skills after the training.
3. School Level Education Development		
3.1 Performance-based School Financing	- MBSSE and District Education Offices - SMCs and school heads	- Aim and objectives of Performance-based financing (PBF) - How Performance-based financing (PBF) can be improved. - Stakeholders understanding of the purpose of PBF and use of the funds for intended purposes. - Inclusive process for designing and agreeing on intervention for financing - How Monitoring will be conducted.
3.2 Physical improvement to Learning Environment	MBSSE, local councils, district education offices	Environmental and Social Risk Assessment and mitigation plans

Project component	Target stakeholders	Expected discussion and decisions
	• SMCs and school heads, teachers and pupils • traditional and opinion leaders, local communities • EPA • Ministry of Labor • MSWFGP • NGO/CSOs • GRM • Contractors	• Organizational structure for E&S implementation • Project Grievance Mechanisms • Disclosure of ESMF, RPF, SEP, ESCP and other related E&S information • Effective ways to provide school infrastructure including discussions on aspects of universal design requirements and how those requirements will be integrated in classrooms, sanitations and water facilities. • Supervision of school infrastructure and maintenance of quality standard. • GRM dissemination
4. Program Management, Coordination and Monitoring and Evaluation		
4.1 Program Management, Coordination and Monitoring and Evaluation	• MBSSE • PFMU of MoF • Local council • FDD	• How to monitor the project activities and achievement of results framework
5. CERC		
6. COVID-19 Education Emergency Response		
6.1 Ensuring strategic communications	• MBSSE, TSC, Heads, Teachers , SLTU	• What factor should be covered in developing a communication strategy • How to make sure the most vulnerable are in the communication loop
6.2 Strengthening continuous distance education service delivery	• TSC, Teachers	• What content needs to be developed • What mode of technology can be used in addition to radio program to reach vulnerable children and children with disabilities • How to identify schools that need radio routers and dongles • What topics need to be covered in pre-loaded content devices • How to provide teacher capacity on facilitation of digital learning, psychosocial support etc.
6.3 Ensuring safe school reopening, and health and safety of students including the most vulnerable	• MBSSE, Schools, Head, SMC, pupils/students • MoHS and NACOVERC/EOCs	• COVID-19 risk and mitigation strategies in schools • What should be covered in developing School Safety Protocols • Academic calendar and how to carry on critical exams • What COVID-19 relevant data needs to be collected to complement annual ASC

Project component	Target stakeholders	Expected discussion and decisions
		• What type of psychosocial support is needed especially for girls with high risk of sexual abuse and harassment during COVID-19 period
6.4 Sustaining effective operations, planning and policy during post COVID-19 crisis	• MBSSE, MoF, local council, SMC,	• How to conduct community engagement in the context of social distancing • What should be the logical sequence of delivering Free Quality School reform agenda
Project implementation stage		
1. Policy, Governance, Accountability, and System Administration		
1.1 Evidence-based Education Planning and Rationalization	• MBSSE • School heads • Teachers, SLTU • Council of Head Teachers, Conference of Principals of Secondary Schools	• What implementation challenges are identified. • Whether the project is achieving expected results.
1.2 Strengthening curriculum and assessment framework	• MBSSE, WAEC • School heads • Teachers • Examiners	• Whether activities are implemented as scheduled. • Whether capacity is built by the project interventions.
1.3 Promoting Gender equality and Inclusive Education	• MBSSE • Schools heads and SMCs/Board of Governors • NGOs and DPs • Disability Commission and Unions	• Whether the project has addressed gender and disability issues. • What challenges are identified.
2. Teacher Management and Professional Development		
2.1 Strengthening TSC for Teacher Workforce Planning and Teacher Management	• TSC • Teachers, SLTU	• What is the strategy developed to improve teacher management and deployment
2.2 Cluster based continuous professional development	• TSC • Teachers, SLTU • Headteachers • MBSSE	• Whether TSC has developed good professional training program. • Whether teachers are using the tablet effectively. • Whether there is an improvement in teacher performance.
3. School Level Education Development		
3.1 Performance-based School Financing	• MBSSE and District Education Offices • SMCs and school heads • Ward education committees • Local councils	• Whether schools improved school performance (students, teachers) after receiving PBF. • Whether school stakeholders understand the purpose of PBF and use the funds for intended purposes. • Whether monitoring mechanism works.

Project component	Target stakeholders	Expected discussion and decisions
3.2 Physical improvement to Learning Environment	• MBSSE, local councils, district education officers, EPA	• Sub-project Environmental and social screening • Assessment and preparation of ESHIA, ESMP,
	• SMCs and school heads, teachers and pupils • traditional and opinion leader, local communities • EPA • Ministry of Labor • MSWFGP • WASH NGO/CSOs • District environmental officers, • Local councils • Contractors	• RAPs as needed • Disclosure of any follow up safeguards instruments • Compensation and resettlement as required • Training and awareness on community Health and Safety including GBV prevention • Awareness on project GRM • Environmental permitting • How school infrastructure improvement can take place. • What kinds of challenges are identified at implementation stage? • Whether monitoring and supervision take place.
4. Program Management, Coordination and Monitoring and Evaluation		
4.1 Program Management, Coordination and Monitoring and Evaluation	• MBSSE • PFMU of MoF • Local councils	• Whether the project achieved the targets. • Whether project management, coordination, monitoring and evaluation are implemented properly.
5. CERC		
6. COVID-19 Education Emergency Response		
6.1 Ensuring strategic communications	• MBSSE, TSC, Heads, Teachers	• What is the strategy developed to communicate? • Whether communication strategy is covering the vulnerable groups
6.2 Strengthening continuous distance education service delivery	• TSC, Teachers, Heads, district education officers	• Whether needed contents developed • Which additional mode of technology were identified for distance learning • Whether schools that need radio routers and dongles identified • Whether pre-loaded content devices developed • Whether teachers were trained
6.3 Ensuring safe school reopening, and health and safety of students including the most vulnerable	• MBSSE, Schools, Head, SMC, pupils/students, MoHS and NACOVERC/ EOCs	• Whether COVID-19 transmission risks and mitigation strategies have been adequately identified. • Whether School Safety Protocols were developed and implemented • Whether Academic Calendar and implementation of critical exams were decided • Whether COVID-19 relevant data was collected

Project component	Target stakeholders	Expected discussion and decisions
		• Whether psychosocial support was provided
6.4 Sustaining effective operations, planning and policy during post COVID-19 crisis	• MBSSE, MoF, local council, SMC,	• Identify community engagement modality in the context of social distancing • Identify and implement logical sequence of delivering Free Quality School reform agenda

5.2 Proposed Strategy for Information Disclosure

18.   Table 6 describes what information will be disclosed, how it will be disclosed and the frequency with which it will be disclosed to each of the stakeholder groups.

Table 6. Strategy for Information Disclosure

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timetable/ Frequency	Target stakeholders	Responsible stakeholders
1. Policy, Governance, Accountability, and System Administration					
1.1 Evidence-based Education Planning and Rationalization	Results of school annual census School standards	Written Report Website of MBSSE and social media	After the completion of activities	School stakeholders Government officials DPs	MBSSE
1.2 Strengthening curriculum and assessment framework	Findings of national assessment	National assessment report, Dissemination workshop (virtual in COVID-19 period), GoSL website, radio, TV and other social media, emails to stakeholders	After national assessment is analyzed	Government officials TSC, SLTU School heads and teachers, CSO/ NGO groups, SMCs	MBSSE
1.3 Promoting Gender equality and Inclusive Education	Supporting information on prevention and responses to school-based gender violence and disability stigma	Website of MBSSE/GoSL, radio, TV and other social media, poster on local councils, and newspapers	Throughout the project implementation	Students, parents, SMCs and communities, female teachers	MBSSE Heads of Schools
2. Teacher Management and Professional Development					

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timetable/ Frequency	Target stakeholders	Responsible stakeholders
2.1 Strengthening TSC for Efficient Teacher Management and Deployment	Strategy of teacher recruitment, management and deployment	Through district TSC, website of TSC SLTU	Throughout the project	Teachers, civil society	TSC SLTU
2.2 Cluster-based Continuous Professional Development for Teachers	Training information	Through district TSC and school heads, website of TSC SLTU	After training date is set	Teachers	TSC SLTU
3. School Level Education Development					
3.1 Performance-based School Financing	School performance information and information on use of PBF	School feedback form displayed in school board	Every term	Parents, communities, and civil society	SMCs, Board of governors
3.2 Physical improvement to Learning Environment	ESMF, RPF/RAP, Stakeholder Engagement Plan, ESCP Infrastructure improvement plan, construction schedule, GRM documents	Disclose in country in two local newspapers and on the government and World Bank websites. Hard copy should be available in key institutions. Post on local council/community noticeboards and radios.	Before appraisal

Before infrastructure improvement plan is approved | Civil society, local communities, Parents, building contractors | MBSSE

Local Councils. SMCs/ Board of Governors |
4. Program Management, Coordination and Monitoring and Evaluation					
4.1 Program Management, Coordination and Monitoring and Evaluation	Information on the project results framework	Government's website	Bi-annual	Civil society Local councils Community Monitoring groups	MBSSE and PFMU
5. CERC					
6. COVID-19 Education Emergency Response					
6.1 Ensuring strategic communication	Communication strategy	Website of MBSSE, Posted on local council/communit	When strategy is developed, during school	Schools, Civil society, Heads, Teachers,	MBSSE, Schools, CSOs

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timetable/ Frequency	Target stakeholders	Responsible stakeholders
	Sensitization communication campaign Safety school protocols	y noticeboards and radios, social media, newspaper, through community leaders	closure and at the time of reopening	Parents, Students	
6.2 Strengthening continuous distance education service delivery	Developed distance-learning content, Best pedagogical practice	Radio, TV. Print materials, phone, online	After content is developed	Students, Teachers	TSC
6.3 Ensuring safe school reopening, and health and safety of students including the most vulnerable	School safety protocols Updated school calendar and exams	government website, Website of MBSSE, Posted on local council/community noticeboards and radios, social media, newspaper	Before schools reopen	Students, Parents, Heads, Teachers, local community	MBSSE, School Board of Governors, SMC, MoHS and NACOVERC/ EOCs, CSOs
6.4 Sustaining effective operations, planning and policy during post COVID-19 crisis	Radical inclusion policy, Information on the CODIV-19 related outcomes	Report, MSSE website, social media, newspaper	Once the policies are developed, COVID-19 information – throughout the project	Civil society, Students, Parents, local community	MBSSE, MoHS and NACOVERC/ EOCs

5.3 Proposed Strategy for Consultation

19.   Table 7 details the proposed strategy for consultation, with varying methods depending on target audience, nature of activities and level of interest of the stakeholder group in project activity. The strategy is revised following the WB interim guidelines on conducting stakeholder engagement in constrained setting. virtual means will be employed to the extent feasible. However, with gradual easing of restrictions, small group gathering will be undertaken following all COVID-19 social distancing and hygiene protocols. Government's evolving COVID-19 guidance will be monitored and SEP updated intermittently.

Table 7. Strategy for Information Disclosure

Project component	Topic of consultation	Methods used	Timetable	Target stakeholders	Responsibilities
1. Policy, Governance, Accountability, and System Administration					

Project component	Topic of consultation	Methods used	Timetable	Target stakeholders	Responsibilities
1.1 Evidence-based Education Planning and Rationalization	School annual census and school standards	Meetings following COVID-19 protocol, use of digital communication, online platforms, telephonic interviews	During the preparation stage	Government officials, DPs, SLTU	MBSSE
1.2 Strengthening curriculum and assessment framework	Curriculum and assessment framework	Meetings following COVID-19 protocol, use of digital communication, online platform, telephonic interviews	During the preparation stage	Government officials, resource persons, Leading teachers, DPs	MBSSE
1.3 Promoting Gender equality and Inclusive Education	Mechanism to address gender issues	Meetings following COVID-19 protocol, use of digital communication, online platform, telephonic interviews	Throughout the project	Government officials, resource persons, DPs	MBSSE
2. Teacher Management and Professional Development					
2.1 Strengthening TSC for Efficient Teacher Management and Deployment	Strategy of teacher management and deployment	Meetings following COVID-19 protocol, use of digital communication, online platform, telephonic interviews	Throughout the project	Teachers, government officials, DPs	TSC
2.2 Cluster-based Continuous Professional Development for Teachers	Development of training contents	Meetings following COVID-19 protocol, use of digital communication, online platform	During the preparation stage	Teachers, DPs	TSC
3. School Level Education Development					
3.1 Performance-based School Financing	PBF implementation	Focus group discussion following COVID-19 protocol and interview (telephonic during COVID-19 crisis) with stakeholders	Every term	SMCs	MBSSE

Project component	Topic of consultation	Methods used	Timetable	Target stakeholders	Responsibilities
3.2 Physical improvement to Learning Environment	Infrastructure improvement plan	Meetings and focus group discussion following COVID-19 protocol, use of digital communication	After beneficiary schools are identified	SMC, local councils, local award committee	MBSSE
4. Program Management, Coordination and Monitoring and Evaluation					
4.1 Program Management, Coordination, Monitoring and Evaluation	Project performance and the project results framework	Meetings following COVID-19 protocol, use of digital communication, social media	Bi-annual	Government officials, local councils, Community Monitoring group	MBSSE and PFMU
5. CERC					
6. COVID-19 Education Emergency Response					
6.1 Ensuring strategic communication	Communication strategy Mechanism of communication campaign	Meetings following COVID-19 protocol, use of email and other digital communication	During the preparation stage	Heads, local councils	MBSSE
6.2 Strengthening continuous distance education service delivery	Distance-learning content, Modality of distance learning	Meetings following COVID-19 protocol, use of email and other digital communication	At preparation stage	Subject matter experts, Digital technology expert on service delivery	TSC
6.3 Ensuring safe school reopening, and health and safety of students including the most vulnerable	Safety school protocols School calendar and exams	Meetings following COVID-19 protocol, use of email and other digital communication	Before schools reopen	WASH experts, Heads, Teachers, local community	MBSSE, School Board of Governors, SMC
6.4 Sustaining effective operations, planning and policy during post COVID-19 crisis	Radical inclusion policy, Necessary Information on the CODIV-19 related outcomes	Meetings with relevant stakeholders, survey	At preparation stage, COVID-19 information – throughout the project	MSWFGP, Disability Commission, NGOs, Civil society, local community	MBSSE

5.4 Proposed Strategy to Incorporate the View of Vulnerable Groups

20.   The MBSSE is responsible for ensuring inclusion and representation, including for vulnerable groups. Inclusion of vulnerable groups during COVID-19 period is challenging. The project has developed a strategy which aims to remove obstacles to participation of such groups during and post COVID-19 period (see table 8).

Table 8. Strategy to incorporate vulnerable groups

Target groups	Strategy
Stakeholders in remote poor rural areas and who have limited access to information	• Information translated to indigenous/local languages for local radio transmission. • Robust engagement with local community-based organizations particularly in post COVID-19 scenario; during COVID-19 crisis, engagement using telephone, emails and other digital communication methods will be used. • Resources allocation to wards representatives and councilors. • Provision of transportation or transportation cost to attend meetings in the post-COVID-19 period. • More information dissemination through the local radio and town criers, posters, local language skits and discussions. Village/chiefdom/district level meetings. • Community level engagement/consultations rather than at a district headquarters. • Engagement of local NGOs and CBO s who work with vulnerable people at the community level to help disseminate information and organize consultations.
Females stakeholders (students, teachers and parents)	• The project will arrange separate consultation sessions (e.g., meetings and focus group discussion) men and women separately in post-COVID-19 period. During the crisis, the project will organize, telephonic and online consultation. • Smaller and gendered focus group discussions following COVID-19 protocol where women and girls are at ease to speak • The project will use various communication measures including women associations or organizations to reach out to female groups at the district/chiefdom/village levels. • The project will use various measures including sensitization, community empowerment, and provision of psychosocial counseling and support services to address gender issues in education such as advocacy and media campaigns, and workshops on gender issues in post-COVID-19 period.
Disabled stakeholders	• The project will use various communication measures such as engagement with Disability Commission, NGOs that work with persons with disabilities to reach out disabled stakeholders. • Information will be translated to sign language/ braille. • Information will be shared with them through supporting organizations, online platforms, digital communications, District/chiefdom/village level meetings.

	• Engagement of local NGO's and CBO's who work with vulnerable people at the community level to help disseminate information and organize consultations • For any face-to-face meetings in post-COVID-19 period, easily accessible values will be used.
Vulnerable/ Disadvantaged families	• The project will arrange separate consultation sessions for different target groups to make their voice heard • The project will use various communication measures to reach disadvantaged family. • Project Community Liaison officer/ District MSWGCA officers/Local Councils/ward committees

5.5 Responsibilities and Resources for Implementing Stakeholder Engagement Activities

21.   Overall responsibility for the project will lie with the MBSSE, which will have a dedicated project secretariat that will be responsible for day-to-day project management and coordination of project activities. The Free project secretariat will provide reports of project progress and make this available to the Minister of Education and the World Bank. To function effectively, the project secretariat will have at least the following contract officers on hand: (a) Head (coordinator(b) M&E officer, (c) Program officer, (g) environmental specialist, (d) Social Safeguards Specialist, and (e) Additional administration staff as needed. Other functions, including communications and human resources, will be carried out by the MBSSE with support and guidance from the project secretariat. The Secretariat (Social Safeguards specialist) is also responsible for implementation of stakeholder engagement activities and GRM activities under Component 4 - Project Management, Coordination, Monitoring and Evaluation (US$6 million), working closely with the communications unit of MBSSE. Stakeholder engagement plan will be incorporated in the Project Operations Manual and Annual World Plan and Budget. Following the guidance prepared by the Ministry of Health and Sanitation, the Secretariat will ensure implementation of COVID -19 education emergency response strategic communication, safe school reopening, and safety and health of students.

22.   Policy direction and the oversight of the project will be carried out by an MDTF Free Education Project Steering Committee at the national level. The committee will review the overall performance of the project and decide on important policy aspects to facilitate the achievement of outcomes and results. Policy direction and the oversight of the project will be carried out by an MDTF Free Education Project Steering Committee on a biannual basis. The committee will comprise heads of the MBSSE, TSC, MoF, World Bank, and MDTF-participating DPs. The committee will act as the steering body for the project and be co-chaired by the Government (rotating chair between the MoF and MBSSE) and the World Bank. Additionally, the COVID-19 EET will also advise and support the Government's education activities during COVID-19 as well as post COVID-19 period. Strategic coordination unit under the EET will be chaired by the minister and include permanent secretary, heads of the EU, UNICEF, DFID, Irish Aid and the World Bank.

6. GRIEVANCE REDRESS MECHANISM

6.1 Introduction

23.   There is currently no clearly defined GRM reporting system in the education sector. Strengthening

system accountability is a key outcome of the project. To this end, the project needs to establish a grievance redress mechanism (GRM). The project is expected to strengthen accountability for beneficiaries and provide channels for project stakeholders to provide feedback on project activities. It is also expected to provide a mechanism that allows for the identification and resolution of issues affecting the project, including safeguards related complaints, misconduct of staff, misuse of funds, abuse of power, and other improper behavior. By increasing transparency and accountability, the GRM aims to reduce the risk of the project negatively affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve project impact. A separate GRM will be established by contractors during implementation to address employee grievances consistent with ESS 2.

24.   The GRM established under the project would be accessible to all, including ethnic, religious, gender, and other special groups. The mechanism focuses not only on receiving and recording complaints but also on how complaints are resolved; and will be supported by an information campaign and training. While feedback would be handled at the level closest to the complainant, all complaints would be registered and follow the set procedures.

6.2 GRM scope and use

25.   **Scope:** The project would include a GRM that will be available for project stakeholders to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

26.   **Who Can Use The GRM?** 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 purposes of making complaints or providing feedback. Project affected people include those who will be affected in resettlement issues. There would be no charge for making a complaint or conveying comments or suggestions.

6.3 Procedures

a.   Establishment of Grievance Redress Committee/Body

27.   The Grievance Redress Committee (GRC) at local level shall be established by MBSSE in consultation with other relevant parties to the project. The membership of the GRC shall comprise of representatives from the following:
   a.   MBSSE
   b.   Local Contractors
   c.   Local Council Environmental and Social Officer
   d.   NGOs/Civil society Organization
   e.   Persons with Disability Association
   f.   Project Social Safeguards Specialist (will be co-opted when necessary)
        M&E officer of the project Secretariat

b.   Channels to make complaints

28.   It is suggested that the project will establish the following channels through which citizens/beneficiaries can make complaints regarding project activities.

   a.   A dedicated email address [EMAIL]

b. A dedicated phone line [TOLL FREE NUMBER]
c. On the project website [WEB ADDRESS]
d. Feedback boxes located at MBSSE District Offices, Local Councils and remote locations with subprojects
e. Letters sent to [ADDRESS]
f. Verbal or written complaints to project staff (directly or through project meetings). (If project stakeholders provide verbal feedback/complaint, project staff will lodge the complaint on their behalf, and it will be processed through the same channels. Project at all stages will have options for use of local languages and interpreters when submitting complaints.
g. Constitution of Grievance Committee members (which include women)
h. Project meetings set up at the [specify] level, each of which include women.
i. Oral language interpreters for lodging complaints

29.   The project shall ensure flexibility in the channels available, make sure that different contact points are available for a person to make a verbal complaint, and that complaints addressed to the wrong person or entity are redirected to the Project secretariat.

c. Confidentiality and conflict of interest

30.   Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known. To maintain anonymity and confidentiality, the name and address of the complainant will be taken out from the grievance form. To ensure this, multiple channels to make a complaint have been established and conflicts of interest will be avoided.

d. Collection/receipt of complaints

31.   The GRM focal person receiving the complaint at the local level, will complete a grievance form (see Annex 1), or make the form available to the complainant to fill out directly, and submit it without delay (within 24 hours) to the Safeguards Officer of the Project Secretariat who is responsible for GRM. The complaints for the project will be collected and compiled by the Free Project Secretariat on a regular basis.

e. Sorting/categorization

32.   Once complaints are received and filed, using the following classification, the local level GRM focal persons will sort the complaints/feedback into the following categories, before forwarding them to the Social Safeguards Specialist of the FREE Education Project:

Category No.	Classification
Category 1	Safeguards, including compensation disputes, land allocation and delays in compensation
Category 2	Grievances regarding violations of policies, guidelines and procedures
Category 3	Grievances regarding contract violations
Category 4	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
Category 5	Grievances regarding abuse of power/intervention by project or government officials
Category 6	Grievances regarding Project Secretariat staff performance
Category 7	Reports of force majeure

Category 8	Reports on discrimination by gender or disability status
Category 9	Reports on GBV or SEA
Category 10	Suggestions
Category 11	Appreciation

f. Recording/logging

33. Once the complaints have been categorized and submitted to the FREE Education Secretariat, the Social Safeguards Specialist logs the details regarding the complaint into the tracking system. GRM files would be stored in a secure setting (password protected IT database or locked storage cabinet for hard copies).

34. For grievances that cannot be resolved at the local level, once a complaint has been logged and sorted, the Project's Social Safeguards Officer will work closely with Social Project Coordinator in determining the following:

- The person responsible to investigate the complaint.
- The timeframe within which the complaint should be resolved.
- The agreed course of action (e.g. investigation, reply not requiring investigation, etc.).

35. Generally, the investigation process will assume three stages and determined based on the nature and gravity of the complaint. However regardless of type/category of complaints, all complainants would be assured of receiving feedback within 10 business days. For resettlement-related complaints, regardless of the complexity of the case, the Social Safeguards Specialist with the Project Secretariat will be involved in the conduct of the investigation

Stage one

36. For local level complaints, the investigation will be conducted by assigned GRM focal persons with the support of the GRC within five days. Using the findings of the investigation, the GRC will decide on a resolution and inform the complainant of the outcome. The GRM focal person will inform the Project Social Safeguards Specialist of the decision and outcome, for documentation purposes.

Stage two

37. For complex complaints that fall into multiple categories or beyond the capacity of the local GRM focal persons, the investigation will be jointly conducted with the support of the Project's Social Safeguards Specialist and officials of the District Education Office within 10 days.

Stage three

38. In circumstances where grievances cannot be investigated and resolved by the GRM focal persons, GRCs and MBSSE District Offices, they will be referred to the Secretariat of the FREE Education Project where a GRC made up of the following representatives will investigate and decide on a resolution:

a. MBSSE – District and Headquarters
b. Local Contractors

c. Local Council Environmental and Social Officer
d. NGOs/Civil society Organization
e. Persons with Disability Association
f. PFMU
g. Project Coordinator
h. Project Social Safeguard Specialist
i. Any other persons or group that may be relevant to the resolution of the grievance.

39. When determining who will be the investigating officer, the Project Secretariat will 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.

40. Once the investigation process has been established, the person responsible for managing the GRM records and enters this data into the log-book.

41. The number and type of suggestions and questions will also be recorded and reported so that they can be analyzed to improve project management and communications.

g. Notification to the complainant

42. If the complainant is known, the Project Secretariat will communicate the timeframe and course of action to her/him by phone, email or mail, within two weeks of receipt of the grievance.[1] If the complainant is not known then the course of action will be logged in the log-book but no effort will be made to find out the complainant. Where the complainant's address is available, this will be provided in writing with a tracking number and the deadlines by which they will hear back from the GRC or Project Secretariat (see Annex 2 Notification Form).

h. Investigation

43. The person responsible for investigating the complaint will gather facts in order to generate a clear picture of the circumstances surrounding the grievance. Verification normally includes site visits, review of documents, a meeting with the complainant (if known and willing to engage), and a meeting with those who could resolve the issue (including formal and informal village leaders, or other leaders).

44. With regards to resettlement and grievances related to valuation of assets, revaluation by an independent valuer may be undertaken at the expense of the project. In case negotiations through the project GRM fail to reach an agreement, the case will be referred to other administrative bodies such as the Ministry of Labor, Office of the Ombudsman and other options available to complainants including the legal system.

45. There will be special procedures for managing GBV complaints including confidential reporting with safe and ethical documenting of such cases, given the need to ensure a survivor-centered approach to resolution. Therefore, complaints will not be investigated and resolved by the GRC, but through special

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[1]This two-week timeframe assumes the number of grievances is relatively small. The time service standard will be adjusted if the volume of grievances increases beyond a manageable level.

arrangements put in place that will link survivors with specialized NGO service providers, procured under the project to manage GBV cases. Survivors will also be linked to other service providers such as the Ministry of Gender and Children's Affairs' One-Stop-Centers, where appropriate.

46.   The results of the verification and the proposed response to the complainant will be presented for consideration to the GRM committee of the MBSSE. Once the decision has been made on the course of action and on the response to provide to the complainant, the Project Secretariat describes the actions to be taken in the grievance form (see Annex 1), along with the details of the investigation and the findings and enters it into the MIS.

i.   Response to complainant

47.   If the complainant is known, the Project Secretariat communicates the proposed action to her/him via letter, email, verbally, as received within 10 days. The complainants will also be informed to whom and how s/he can appeal the action decided in the initial case.

48.   The Project Secretariat will request feedback from the complainant as to whether s/he deems the action(s) satisfactory, and this will be recorded along with the details of the complaint and the response taken.

j.   Possibility to appeal

49.   In the event the complainant is satisfied with the response, discussions will be held in group or individually to further clarify the positions at stake. Senior management will take part in these meetings and a final decision on the action(s) will be made.

50.   The Project Secretariat will form a Grievance Committee that will hear appeals. The Grievance Committee shall be comprised of staff from the Project Secretariat and persons who are independent from the project implementing authorities and the government. The terms of reference of the Grievance Committee will be agreed prior to its format.

51.   The complainant is not precluded from appealing outside the project/Project Secretariat GRM[2] if they are not satisfied with the proposed response.

6.4 Awareness-building

a.   Information provided in an accessible format

52.   Information about the grievance handling system will be distributed to all beneficiaries and project affected people through regular information channels used by the project, including initiating meetings at the start of the project, public consultations held on resettlement, public meetings during project implementation, brochures/pamphlets in local languages, posting on notice boards and online Information about the grievance management system will also be shared in council meetings, meetings with vulnerable groups, meetings with contractors and workers. Short skits and jingles will be developed and used for awareness building campaign.

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[2] An alternate dispute mechanisms such as a court of elders or to the formal legal system.

53.   The Project Secretariat will include information provided on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints.

b.   Proactive advertisement/regular public information campaigns

54.   Information campaigns will be designed by the Project Secretariat before project commencement to encourage the use of the GRM. The campaigns will use local media (e.g. TV, newspaper, radio). When organizing and conducting these campaigns, special efforts shall be made to reach vulnerable groups. The campaigns would include information on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, principle of confidentiality and right to make anonymous complaints. Information on complaints received and resolved will be reported as part of the project's routine quarterly reporting. Also, a summary of implementation of the grievance mechanism will be provided to the public on an annual basis, after removing identifying information on individuals to protect their identities.

6.5 Staffing and capacity-building

a.   Roles and responsibilities

55.   The Project Secretariat will manage GRM inhouse. These will be documented in the first Quarterly Progress Report and kept updated.

- Overall management of the GRM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording/logging of complaints
- Notification to the complainant
- Sorting/categorization of complaints
- Investigation
- Decision-making based on the investigation results
- Processing appeals
- Publishing responses to complaints
- Organization and implementation of information materials and awareness campaigns
- Budgeting of the GRM
- Reporting and feedback on GRM results

b.   Capacity-building

56.   Training for all relevant staff and relevant stakeholders will be held annually, or as otherwise agreed. New staff will receive training as a regular part of the onboarding process. The training will include all aspects of the GRM set out in this chapter. All trainings should include information on the GRM principles and procedures. The training will have an emphasis on accountability to the complainant. A key focus at the outset will be shifting from informal complaint resolution, to the logging of all complaints/feedback into this system.

57.   Dedicated trainings should be provided to staff directly engaging with beneficiaries, those handling the system, and those involved in the management and oversight of the system.

6.6 Transparency, monitoring and reporting

a. Transparency

58.   Policies, procedures and regular updates on the GRM system, the complaints made and resolved, will be available online, as well as on local/ministerial notice boards and other permanent displays. They will be updated quarterly.

b. Regular internal monitoring and reporting

59.   The Project Secretariat will assess the functioning of the GRM and undertake spot checks during regular supervision visits. The Project Secretariat will work with Social Safeguards Officer to:

- Ensure accurate entry of GRM data into the management information system or other system. Produce compiled reports to the format agreed with the Project Director.
- Provide a monthly/quarterly snapshot of GRM results (as set out below) 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.

60.   During annual/bi-annual general meetings, the project team shall discuss and review the effectiveness and use of the GRM and gather suggestions on how to improve it.

c. Reporting in quarterly and annual progress reports submitted to the Bank

61.   Quarterly and annual progress reports shall include a GRM section which provide updated information on the following:

- Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting 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.
- Satisfaction with the action taken
- Any particular 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

d. Oversight and review

62.   The status of the development of the GRM, the levels of use by beneficiaries/ citizens, the challenges of implementation etc., will be discussed in semi-annual/annual portfolio meetings. The

Project Secretariat will discuss with the Bank during implementation support missions any corrective measures that may be needed.

63.   An independent review/audit of the GRM, will be conducted prior to the mid-term review to assess the effectiveness and use of the mechanism, and recommend introduce improvements as necessary.

7. MONITORING AND REPORTING

7.1 Involvement of Stakeholders in Monitoring Activities

64.   The M&E activities will focus on inputs, processes, and outcomes. Given the strong alignment between the proposed project's indicators and those to be used to monitor the implementation and measure the impact of the Government's program, monitoring of these indicators will be incorporated into the MBSSE EMIS and will be tracked as part of standard monitoring under the technical supervision and support of the Directorate of Planning. A Social Safeguards Officer and an M&E officer of the Project Secretariat will work closely with the MBSSE to ensure data collection, cleaning, analysis, and reporting are completed according to the project requirements.

65.   The MBSSE collects data annually on all schools in basic and senior secondary education through annual ASCs, including information on gender and children with disabilities. School performance and key indicators including gender and children with disabilities will be tracked through the ASC. Given the project's reliance on timely and reliable data for effective implementation, capacity building in the areas of data collection, analysis, reporting, and dissemination will be provided.

66.   The Free project secretariat, with support from Social Safeguards Officer and M&E officer, will be responsible for monitoring and compiling a number of reports as well as ensuring the effective carrying out of the ASC and other project-supported activities reliant on data. The following reports will be required throughout the project duration at established intervals: (a) annual work plan on project implementation by component and subcomponent, including stakeholder engagement plan and (b) progress reports detailing achievements under each activity, progress on each of the indicators in the Results Framework, and analysis of identified gaps and next steps (biannually). The performance of the project will be reviewed regularly, including through biannual implementation support and supervision mission led by the Word Bank.

67.   The World Bank will provide implementation support and supervision during the project implementation period. Implementation support and supervision missions will be undertaken at least every six months and will monitor and report on progress made under the project through the implementation status and results reports (ISRs). The World Bank will also review whether the project has taken necessary actions to address issues on gender, GBV and disability. An in-depth review will be undertaken at the project implementation midpoint. A midterm review will provide an opportunity to assess overall progress in project implementation, update the Results framework as necessary, review allocation across components, reassess the risks, and propose corrective measures to ensure achievement of the PDO.

68.   Monitoring and evaluation under the project will rely on each level of the education system—from the school level, to local levels, and the central level. The MBSSE is responsible for ensuring effective

monitoring processes are adopted and that information flow is smooth reaching the relevant stakeholders on time. Steps will be taken to ensure that each feedback mechanism established under the project can provide timely data to the local-level stakeholders. The project will maintain a strong GRM given the project's reliance on community inputs for effective implementation and achievement of project outcomes. Information on the GRM will be provided in the context of SMC and school-level training. The project secretariat will ensure timely response to any grievances received.

ANNEX 1: GRIEVANCE FORM

GRIEVANCE/INQUIRY RECORD

Instructions: This form is to be completed by staff receiving the inquiry or grievance and sent to the Free Project Secretariat at the national office. Attach any supporting documentation/letters as relevant.

Date Grievance Received:	Name of Staff Completing Form:

Grievance Received (check √):
□ National □ District □ Chiefdom

Mode of Filing Inquiry or Grievance (check √):

□ In person □ Telephone □ E-mail □ Phone Text Message □ Website

□ Grievance/Suggestion box □ Community meeting □ Public consultation □ Other _____

Name of Person Raising Grievance: *(information is optional and always treated as confidential)*

Gender: □ Male □ Female

Address or contact information for Person Raising Grievance: *(information is optional and confidential)*

Location where grievance/problem occurred [write in]

National:	District:	Chiefdom:	Others:	Others:

Brief Description of Grievance or Inquiry: *(Provide as much detail and facts as possible)*

	Category 1	Safeguards, including compensation disputes, land allocation and delays in compensation
	Category 2	Grievances regarding violations of policies, guidelines and procedures
	Category 3	Grievances regarding contract violations
	Category 4	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
	Category 5	Grievances regarding abuse of power/intervention by project or government officials
	Category 6	Grievances regarding Free Project Secretariat staff performance
	Category 7	Reports of force majeure
	Category 8	Suggestions
	Category 9	Appreciation

Who should handle and follow up on the grievance:

Progress in resolving the grievance (e.g., answered, being resolved, settled):

Other Comments:

ANNEX 2: NOTIFICATION FORM

<table>
<tr><td colspan="2">GRIEVANCE ACKNOWLEDGEMENT</td></tr>
<tr><td colspan="2"><i>Instructions: This form is to be completed by the Free Project Secretariat and mailed or delivered to the complainant.</i></td></tr>
<tr><td>Date Grievance Received:</td><td>Tracking Number:</td></tr>
<tr><td colspan="2">Grievance Received (check √):
□ National   □ District   □ Chiefdom</td></tr>
<tr><td colspan="2">Mode of Filing Inquiry or Grievance (check √):

□ In person   □ Telephone   □ E-mail   □ Phone Text Message   □ Website

□ Grievance/Suggestion box   □ Community meeting   □ Public consultation   □ Other _____</td></tr>
<tr><td colspan="2">Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>

<i>Gender:</i>   □ <i>Male</i> □ <i>Female</i></td></tr>
<tr><td colspan="2">Contact information for the Person Raising Grievance: <i>(information is optional and confidential)</i>

Email:
Phone:
Address:</td></tr>
</table>