

Republic of Sierra Leone



Sierra Leone Free Education Project

Stakeholder Engagement Plan (SEP)

Ministry of Basic and Senior Secondary Education (MBSSE)

8 June 2023

Table of Contents

Table of Contents	2
TABLES.....	3
ABBREVIATIONS AND ACRONYMS	4
1. INTRODUCTION/PROJECT DESCRIPTION.....	6
2. OBJECTIVE/DESCRIPTION OF STAKEHOLDER ENGAGEMENT PLAN (SEP)	7
3. STAKEHOLDER IDENTIFICATION AND ANALYSIS	7
3.1 Methodology.....	7
4. STAKEHOLDER ENGAGEMENT PROGRAMME	14
4.1 Brief summary of previous stakeholder engagement done	14
4.2 Summary of Project stakeholder needs and methods, tools and techniques for stakeholder engagement.....	15
4.3 Stakeholder engagement plan	15
4.4 Reporting back to stakeholders	24
5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES.....	27
5.1 Resources	27
5.2 Management functions and responsibilities	28
6. GRIEVANCE MECHANISM.....	28
6.3 Procedures	29
6.4 Awareness-building.....	33
6.5 Staffing and capacity-building	33
6.6 Transparency, monitoring and reporting.....	34
7. MONITORING AND REPORTING	35
7.1 Summary of how SEP implementation will be monitored and reported	35
7.2 Reporting back to stakeholder groups.....	36
ANNEX 1: STAKEHOLDER ENGAGEMENT ACTIVITIES CONDUCTED DURING PROJECT IDENTIFICATION AND PREPARATION STAGE	37
ANNEX 2: FEEDBACK LOOP	40
ANNEX 3: GRIEVANCE FORM	41
ANNEX 4: NOTIFICATION FORM.....	42

TABLES

Table 1: List of Potentially Affected Stakeholders and Other Interested Parties	8
Table 2: List of Disadvantaged/Vulnerable Individuals/Groups	10
Table 3: Stakeholder engagement plan at Project Preparation and Implementation Stages (including AF)	15
Table 4: Strategy to Incorporate Views of Vulnerable Groups.....	23
Table 5: Strategy for Information Disclosure.....	24
Table 6: Classification of Complaints	30

ABBREVIATIONS AND ACRONYMS

AF	Additional Funding
ASC	Annual School Census
CBO	Community-based Organisation
CERC	Contingent Emergency Response Component
COVID-19	Coronavirus 2019
CSO	Civil Society Organization
DEO	District Education Officer
DFID	Department for International Development
DP	Development Partner
E&S	Environmental and Social
EAA	Education Above All
EET	Education Emergency Taskforce
EMIS	Education Management Information System
EOC	Emergency Operations Center
EPA	Environmental Protection Agency
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHIA	Environmental, Social, and Health Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESP	Education Sector Plan
ESS	Environmental and Social Standard
EU	European Union
FEPS	Free Education Project Secretariat
FREE	Free Education
GBV	Gender-based Violence
GoSL	Government of Sierra Leone
GPE	Global Partnership for Education
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IDA	International Development Association

ISR	Implementation Status and Results
IT	Information Technology
JSS	Junior Secondary School
LC	Local Council
M&E	Monitoring and Evaluation
MBSSE	Ministry of Basic and Senior Secondary Education
MDTF	Multi-donor Trust Fund
MIS	Management Information System
MoF	Ministry of Finance
MOHS	Ministry of Health and Sanitation
MoPED	Ministry of Planning and Economic Development
MSWGCA	Ministry of Social Welfare, Gender, and Children's Affairs
NACOVERC	National Covid-19 Emergency Response Centre
NGO	Non-governmental Organisation
OOSC	Out-of-school Children
PBF	Performance-based Financing
PDO	Project Development Objective
PFMU	Project Fiduciary Management Unit
RAP	Resettlement Action Plan
RBF	Results-based Financing
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SLTU	Sierra Leone Teachers Union
SMC	School Management Committee
SME	Small and Medium-sized Enterprises
TLM	Teaching and Learning Material
TSC	Teaching Service Commission
TTI	Teacher Training Institution
UNICEF	United Nations Children's Fund
WAEC	West African Examinations Council
WASH	Water, Sanitation and Hygiene

1. INTRODUCTION/PROJECT DESCRIPTION

1. The Free Education (FREE) Project (US\$66.97 million) was approved by the Board on 29 June 2020 and became effective on 10 August 2020. The Project Development Objectives (PDOs) of the FREE Project are to improve the management of the education system, teaching practices and learning conditions. The FREE Project is financed by International Development Association (IDA) and a World Bank-administered Sierra Leone education multi-donor trust fund (MDTF).
2. An Additional Financing (AF) grant for the Coronavirus Disease 2019 (COVID-19) Education Response in the amount of US\$6.85 million from the Global Partnership for Education (GPE), was added to the Parent FREE Project in 2021. The AF for COVID-19 response (Component 6) was successfully implemented and closed on 31 December 2022. A second AF in the amount of US\$33.73 million (US\$20 million from IDA and US\$13.73 million from Education Above All (EAA) has been proposed and is expected to be approved by August 2023. The proposed AF will allow the project to scale up key efforts to support education reform. In parallel, the restructuring will extend the Project closing date from 30 September 2025 to 31 December 2027.
3. The Project is being implemented nationwide in all sixteen districts and the main implementing agencies are the Ministry of Basic and Senior Secondary Education (MBSSE) and the Teaching Service Commission (TSC). Activities supported under the Project aim to address school- and system-level challenges facing the education sector. Some of the interventions added under the new AF will be implemented by a Non-governmental Organisation (NGO) Consortium led by Save the Children and partnered with four NGOs across the country to collaborate with the MBSSE and TSC on the delivery of services, with the objectives of accelerating foundational learning for all and the enrollment and retention of out-of-school children (OOSC) in quality primary education.
4. 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.
5. The parent 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)
 - Component 6: COVID-19 Education Response (Closed December 2022)
6. A seventh component, *Supporting and Reinforcing Foundational Learning for All* (Estimated project financing: US\$19.7 million), will be added to the FREE Project. AF2 will also extend the scope of some existing activities. The seventh component will comprise the following sub-components:
 - 7.1 Accelerating Foundation Learning Competencies (estimated project financing: US\$13 million)
 - 7.2 Improving Learning Opportunities Catering for OOSC (estimated project financing: US\$2 million)
 - 7.3 Strengthening the System to Monitor OOSC (estimated project financing: US\$0.725 million)
 - 7.4 NGO Consortium Supporting OOSC (estimated project financing: US\$4 million)

7. The FREE Project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 (Stakeholder Engagement and Information Disclosure), the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner that is free of manipulation, interference, coercion, discrimination or intimidation.

2. OBJECTIVE/DESCRIPTION OF STAKEHOLDER ENGAGEMENT PLAN (SEP)

8. The overall objective of this Stakeholder Engagement Plan (SEP) is to update the SEP to reflect the AF interventions. The SEP for the Parent Project – SL FREE Education Project – was approved and disclosed on 7 June 2019, both on the Bank's and client's websites. The original SEP was updated in August 2020 to include additional activities to be financed through the first AF from the GPE COVID-19 grant, in the amount of US\$6.85 million, for a COVID-19 education response intervention as a sixth component. The SEP is now updated to include the additional activities to be financed through the second AF from the IDA grant and EAA grant, in the amount of US\$33.73 million. This AF will support a new Sub-component 3.3, *School Health*, (provision of first aid kits to schools) and a new Component 7, *Supporting and Reinforcing Foundational Learning for All*.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Methodology

9. In order to meet best practice approaches, the Project and the activities under the AF will apply the following principles for stakeholder engagement:
 - *Openness and life-cycle approach*: Public consultations for the AF (as well as the whole Project) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
 - *Informed participation and feedback*: Information will be provided to and widely distributed among all stakeholders in an appropriate format. Opportunities are provided for communicating stakeholder feedback and for analysing and addressing comments and concerns.
 - *Inclusiveness and sensitivity*: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the Project is inclusive. All stakeholders are encouraged to be involved in the consultation process at all times. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of Project benefits – particularly women, the elderly, persons with disabilities, displaced persons and migrant workers and communities – and the cultural sensitivities of diverse ethnic groups.

3.2 Affected parties and other interested partiesⁱ

10. Affected parties include local communities, community members and other parties that may be subject to direct impact from the Project. Table 1 lists both the affected parties and other interested parties by component. The activities and the new interventions (Sub-component 3.3 and Component 7) funded by the second AF and activity-relevant parties have been included in the table.

Table 1: 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 rationalisation	MBSSE, heads, teachers and school management committees (SMCs) / boards of governors	Education sector plans (ESPs) and budgeting; school approval and catchment area; provision of formula-based school funding; education management and information system (EMIS), quality assurance	Ministry of Finance (MoF), Ministry of Planning and Economic Development (MoPED, policy makers, communities, NGOs
1.2 Strengthening curriculum and assessment framework	MBSSE, West African Examination Council (WAEC), head teachers, TSC, Local Council	Curriculum review, gender and disability, special needs teacher training, monitoring and evaluation	NGOs, Ministry of Social Welfare, Gender and Children Affairs (MSWGCA), Sierra Leone Teachers Union (SLTU)
1.3 Promoting gender equality and inclusive education	MBSSE; head teachers; teachers; SMCs; gender, disability advocacy and women's rights groups	Capacity building; gender and disabilities visibility; Curriculum diversity; an environment safe from sexual harassment and school-based gender-based violence (GBV); special needs education; safeguarding policy and referral pathway; strengthen guidance counselors	Local community, traditional leaders, religious leaders, NGOs, MSWGCA
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, 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, teacher training institution (TTIs), NGOs
	Teachers	Career development and training	
	MBSSE	Capacity building Digital Database for recruitment and deployment	SLTU
Component 3: School-Level Education Development			

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
3.1 Performance-based school financing (PBF)	MBSSE, heads, teachers and SMCs/boards of governors	Provision of PBF	MoF, policy makers, communities, NGOs
3.2 Physical improvement to learning environment	Local contractors	Renovation and construction of schools	Ministry of Lands, local contractors, chiefs and local authorities, Environmental Protection Agency (EPA), Ministry of Works, Ministry of Labor, MSWGCA
	Heads, teachers, SMCs	Maintenance of infrastructure	
	Local councils, communities	Community engagement Information and communication	
3.3 School health	Heads, teachers and SMCs/boards of governors	Content of the first aid kits, training of teachers of utilisation and maintenance of first aid kits	MBSSE, Ministry of Health and Sanitation (MoHS)
Component 4: Project Management, Coordination and Monitoring and Evaluation			
4.1 Project 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, Sensitisation communication campaign, School reopening	Communities, NGOs, SLTU
Component 7: Supporting and Reinforcing Foundational Learning for All			
7.1 Accelerating foundational learning competencies	MBSSE, TSC, heads, teachers, district-officers and school quality assurance officers	Support of improving foundational learning competencies of early grade students.	Communities, parents, NGOs, policy makers
7.2 Improving learning opportunities catered for OOSC	MBSSE, TSC, heads, teachers, primary and secondary school pupils	Development of the accelerated primary school curriculum; provision of teacher training in community learning centres, provision of teaching and learning material (TLM), back-to-school incentives and essentials for children	Parents, communities, NGOs, policy makers, SLTU
7.3 Strengthening	MBSSE, local councils	Data collection and management	Statistics Sierra Leone, NGOs,

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
system to monitor OOSC		on OOSC and monitoring OOSC at centralised and decentralised levels	development partners
7.4 NGO consortium supporting foundational learning and OOSC	NGO, MBSSE, TSC, OOSC, local councils and communities	Providing targeted support for vulnerable learners; mobilisation and capacity building of community stakeholders in targeted districts to identify and enroll OOSC into various learning programmes; collaborating with MBSSE and TSC to implement non-formal education programmes and alternative learning pathways; improving learning opportunities and environment catered for OOSC, other vulnerable children and those often excluded	NGOs, communities, development partners

3.3 Disadvantaged/vulnerable individuals or groups

11. 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. Under the Free Education Project, different groups can be vulnerable in terms of different interventions/components. Table 2 shows potential disadvantaged/vulnerable individuals/groups under each of the components and the limitations they may have regarding participating in the consultation process. Vulnerable groups under the newly added activities supported by the AF have also been included in the table (Sub-component 3.3 and Component 7). Vulnerable groups within the communities affected by the FREE Project will be added, further confirmed, and consulted with through dedicated means, as appropriate.

Table 2: 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 rationalisation	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, engagement at local level, including the use of radio, TV, online discussions, and other modern forms of	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
			online platforms, town hall meetings	
1.2 Strengthening curriculum and assessment framework	Local communities, women/federation of persons with disability	Limited voice, under-represented, lack of access to information	Limited meetings with representative of vulnerable groups, engagement at local level, including the use of radio, TV, discussions in online platforms, and other modern forms of communications	Internet access, electronic gadgets, safe transportation
1.3 Promoting gender equality and inclusive education	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 community level to help disseminate information and organise 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
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
Component 3: School Level Education Development				
3.1 Performance-based school financing	School stakeholders in remote poor rural areas, women and young people	Remote distance, poor communication network, under-represented	Meetings at community level, community notices, local radio	Transportation information on noticeboards, use of social media for information dissemination, internet access, online platform, recruitment of volunteers to disseminate information to remote areas

Project component	Vulnerable groups and individual	Peculiar Characteristics / Needs	Preferred means of notification / Consultation	Additional Resources Required
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, transportation to meetings, language barrier, visual impairment, classrooms, sanitations and water facilities that are unfriendly to disabled and vulnerable group	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 needs to adapt universal design requirements with the objective of providing vulnerable and disadvantaged students, teacher and other users with equitable access to schools' facilities
3.3 School health	Poor and disadvantaged children, pregnant students, students with disabilities	Poor health, lack of access to health facilities	School-level engagement, teacher training needs on the use of first aid kit	Provision of teacher training on engaging with vulnerable students on health issues
Component 4: Project Management, Coordination and Monitoring and Evaluation				
4.1 Project 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 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 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
6.2 Strengthening continuous distance education service delivery	Children without access to radio (or mobile and internet) or poor radio	Lack of access to radio or other distance learning media	Community notices, community use of radio and other digital technology (such as television, mobile,	Provision of radio routers, dongles and small generators to schools and regional offices to tap into existing internet connections; provision of radios and televisions

Project component	Vulnerable groups and individual	Peculiar Characteristics / Needs	Preferred means of notification / Consultation	Additional Resources Required
	transmission		internet)	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 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 (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 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.
Component 7: Supporting and Reinforcing Foundational Learning for All				
7.1 Accelerating foundational learning competencies	OOSC – children	OOSC – children of the official primary school age-range who are not participating in a primary- or secondary-level education programme and children over the official primary school age-range	Engagement at local level, including the use of local radio, social media and town hall, community stakeholders, such as chiefs and other community leaders	Community outreach campaign, psychosocial support
7.2 Improving learning	OOSC – children	OOSC – children of the official primary	Engagement at local level, including the use of local	Community outreach campaign, psychosocial support

Project component	Vulnerable groups and individual	Peculiar Characteristics / Needs	Preferred means of notification / Consultation	Additional Resources Required
opportunities catered for OOSC		school age-range who are not participating in a primary- or secondary-level education programme and children over the official primary school age-range	radio, social media, town hall, community stakeholders (such as chiefs and other community leaders)	
7.3 Strengthening system to monitor OOSC	OOSC – children	OOSC–children of the official primary school age-range who are not participating in a primary- or secondary-level education programme and children over the official primary school age-range	Engagement at local level, including the use of local radio, social media, town hall and community stakeholders (such as chiefs and other community leaders)	Community outreach campaign, psychosocial support,
7.4 NGO consortium supporting foundational learning and OOSC	OOSC – children	OOSC–children of the official primary school age-range who are not participating in a primary- or secondary-level education programme and children over the official primary school age-range	Engagement at local level, including the use of local radio, social media, town hall, and community stakeholders (such as chiefs and other community leaders)	Community outreach campaign, psychosocial support

4. STAKEHOLDER ENGAGEMENT PROGRAMME

4.1 Brief summary of previous stakeholder engagement done

12. During the project identification and preparation stage, numerous consultations took place at national and regional level – involving the MBSSE, TSC and MoF – and at local and school levels – involving other agencies and key stakeholders. The environmental, social reports and plans were disclosed through the Project portal. Feedback received during consultations was taken into account and was incorporated into the Project design and implementation arrangement. A summary of the main topics discussed and integrated into the Stakeholder

Engagement Plan is provided in Annex 1. The table has been updated to include engagement activities pertaining to the AF.

4.2 Summary of Project stakeholder needs and methods, tools and techniques for stakeholder engagement

13. Different engagement methods are being utilised and cover different stakeholder needs. The main methods utilised for stakeholder engagement are formal meetings with structured agendas, roundtable discussions, focus group meetings/discussions, community consultations, one-on-one interviews, and site visits. Correspondence by phone and/or email, one-on-one interviews, and formal meetings and roundtable discussions are mainly used to interact with government entities and development partners. Local communities and stakeholders are engaged with and Project documentation shared in a culturally appropriate and accessible manner by means of letters to village leaders, traditional notifications, community meetings, focus group discussions, outreach activities and site visits.

4.3 Stakeholder engagement plan

Table 3: Stakeholder Engagement Plan at Project Preparation and Implementation Stages (including AF)

Project Component	Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Project preparation stage					
1. Policy, Governance, Accountability, and System Administration					
1.1 Evidence-based education planning and rationalisation	Preparation	<ul style="list-style-type: none"> 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 	Formal meeting, roundtable discussions, correspondence by phone/email	Government officials, DPs, SLTU	MBSSE
	Implementation	<ul style="list-style-type: none"> What implementation challenges are identified Whether the Project is achieving expected results 	Formal meeting, roundtable discussions	Government officials, DPs, SLTU	MBSSE
1.2 Strengthening curriculum and assessment framework	Preparation	<ul style="list-style-type: none"> How curriculum and assessment framework can be improved and be more inclusive What capacity building is needed 	Formal meeting, roundtable discussions, focus group discussion	Government officials, TSC, WAEC, teacher training colleges	MBSSE

Project Component	Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
	Implementation	<ul style="list-style-type: none"> Whether activities are implemented as scheduled Whether capacity is built by the Project interventions 	Meeting, roundtable discussions, correspondence by email	Government officials, TSC	MBSSE
1.3 Promoting gender equality and inclusive education	Preparation	<ul style="list-style-type: none"> 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. 	Focus group discussion, outreach activities, meetings	School heads and SMCs, NGOs and DPs	MBSS
	Implementation	<ul style="list-style-type: none"> Whether the Project has addressed gender and disability issues What challenges are identified. 	Focus group discussion, outreach activities, meetings, site visit, correspondence by email	Schools' heads and SMCs/ boards of governors, NGOs and DPs, Disability Commission and Unions	MBSSE
2. Teacher Management and Professional Development					
2.1 Strengthening TSC for Teacher Workforce Planning and Teacher Management	Preparation	<ul style="list-style-type: none"> Issues TSC encounter regarding teacher management and deployment Incentives for deployment of teachers, especially female teachers to remote areas 	Formal meetings, roundtable discussions, focus group discussion	Government officials, Teachers, SLTU, DPs	TSC
	Implementation	<ul style="list-style-type: none"> What is the strategy developed to improve teacher management and deployment 	Correspondence by phone/email, meetings	Government officials, SLTU, DPs	TSC

Project Component	Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
2.2 Cluster-based continuous professional development	Preparation	<ul style="list-style-type: none"> Strengthening pedagogical skills by TSC Effective use of teacher and other teaching aids by teachers Improvement of teachers teaching skills after the training. 	Formal meeting, roundtable discussions, training	Teachers, DPs	TSC
	Implementation	<ul style="list-style-type: none"> Whether TSC has developed good professional training programme Whether teachers are using the tablet effectively Whether there is an improvement in teacher performance 	Spot checks, focus group discussion, after-training survey	Teachers, DPs	TSC
3. School Level Education Development					
3.1 Performance-based school financing	Preparation	<ul style="list-style-type: none"> Aim and objectives of performance-based financing (PBF) How 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 	Focus group discussions, SMC meeting, formal meetings and consultations	SMCs and school heads	MBSSE
	Implementation	<ul style="list-style-type: none"> Whether schools improved school performance (students, 	Focus group discussion, SMC meetings	SMCs and school heads	MBSSE

Project Component	Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		<p>teachers) after receiving PBF</p> <ul style="list-style-type: none"> Whether school stakeholders understand the purpose of PBF and use the funds for intended purposes Whether monitoring mechanism works 			
3.2 Physical improvement to learning environment	Preparation	<ul style="list-style-type: none"> Environmental and Social Risk Assessment and mitigation plans Organisational structure for E&S implementation Project grievance mechanisms (GRMs) Disclosure of ESMF, RBF, 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, sanitation and water facilities Supervision of school infrastructure and maintenance of quality standard GRM dissemination 	Meetings, focus group discussions	Local councils, district education offices, SMCs and school heads, teachers and pupils, traditional and opinion leaders, local communities, EPA, Ministry of Labor, NGOs/CSOs, GRM contractors	MBSSE
	Implementation	<ul style="list-style-type: none"> Sub-project environmental and social screening Assessment and preparation of ESHIA, ESMP Resettlement Action 	Meetings, focus group discussions	Local councils, SMCs and school heads, teachers and pupils, traditional and opinion leaders, local	MBSSE

Project Component	Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		Plans (RAPs) as needed <ul style="list-style-type: none"> • 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 		communities, EPA, Ministry of Labour, WASH, NGO/CSOs, district environmental officers, local councils, contractors	
3.3 School Health	AF2 preparation stage	<ul style="list-style-type: none"> • Content of first aid kit 	Formal meetings, correspondence by email	MOHS, DPs	MBSSE
4: Project Management, Coordination and Monitoring and Evaluation					
4.1. Project management, coordination and monitoring & evaluation	Preparation stage	<ul style="list-style-type: none"> • How to monitor the Project activities and achievement of results framework 	Formal meetings, correspondence by email	PFMU of MoF, local council	MBSSE
	Implementation	<ul style="list-style-type: none"> • Whether the Project achieved the targets • Whether Project management, coordination, monitoring and evaluation are implemented properly 		MBSSE PFMU of MoF Local councils	MBSSE
5. CERC					

Project Component	Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
6. COVID-19 Education Emergency Response					
6.1 Ensuring strategic communications	AF1 Preparation	<ul style="list-style-type: none"> What factors should be covered in developing a communication strategy How to make sure the most vulnerable are in the communication loop 	Meetings following COVID-19 protocol, use of email and other digital communication	Heads, local council	MBSSE
	Implementation	<ul style="list-style-type: none"> What is the strategy developed to communicate? Whether communication strategy is covering the vulnerable groups 	Meetings following COVID-19 protocol, use of email and other digital communication	Heads, local council	MBSSE
6.2 Strengthening continuous distance education service delivery	AF1 Preparation	<ul style="list-style-type: none"> What content needs to be developed What mode of technology can be used in addition to radio programmes 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. 	Meetings following COVID-19 protocol, use of email and other digital communication	Subject matter experts, digital technology expert on service delivery	TSC
	Implementation	<ul style="list-style-type: none"> Whether needed contents developed Which additional mode of technology were identified for distance learning Whether schools that 		Subject matter experts, digital technology expert on service delivery	TSC

Project Component	Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		<p>need radio routers and dongles identified</p> <ul style="list-style-type: none"> • 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	AF1 Preparation	<ul style="list-style-type: none"> • 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 • What type of psychosocial support is needed especially for girls with high risk of sexual abuse and harassment during COVID-19 period 	Meetings following COVID-19 protocol, use of email and other digital communication	MoHS, WASH experts, heads, teachers, local community NGOs	MBSSE
	Implementation	<ul style="list-style-type: none"> • 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 	Meetings following COVID-19 protocol, use of email and other digital communication	Schools, head, MoHS and NACOVERC/EOCs, NGOs	MBSSE

Project Component	Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		relevant data was collected			
6.4 Sustaining effective operations, planning and policy during post COVID-19 crisis	AF1 Preparation	<ul style="list-style-type: none"> How to conduct community engagement in the context of social distancing What should be the logical sequence of delivering Free Quality School reform agenda 	Relevant stakeholders survey	Ministry of Social welfare, Disability Commission, NGOs, civil society, local community	MBSSE
	Implementation	<ul style="list-style-type: none"> Identify community engagement modality in the context of social distancing Identify and implement logical sequence of delivering Free Quality School reform agenda 		MBSSE, MoF, local council, NGOs	MBSSE
7. Supporting and reinforcing Foundational Learning for ALL					
7.1 Accelerating Foundational Learning Competencies	AF2 Preparation Stage	<ul style="list-style-type: none"> The new curriculum The sequencing of implementation 	Meetings, expert discussion, use of digital communication	Schools' heads & SMCs, NGOs, education committees, DPs	TSC
7.2 Improving Learning Opportunities Catered for OOSC	AF2 Preparation Stage	<ul style="list-style-type: none"> The new curriculum 	Meetings, focus group discussion	SMC, NGOs, Local council, DPs	MBSSE
7.3: Strengthening System to Monitor OOSC	AF2 Preparation Stage	<ul style="list-style-type: none"> Identify OOSC Depth of SME involvement 	Meetings, focus group discussion	Government officials, local councils, community monitoring group	MBSSE
7.4 NGO Consortium Supporting Foundational	AF2 Preparation Stage	<ul style="list-style-type: none"> Implementation of non-formal education programmes and 	Meetings, focus group discussion	Local council, communities, volunteer teachers	NGO Consortium

Project Component	Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Learning and OOSC		alternative learning pathways			

Table 4: Strategy to Incorporate Views of Vulnerable Groups

Target groups	Strategy
Stakeholders in remote, poor rural areas and who have limited access to information	<ul style="list-style-type: none"> • Information translated to indigenous/local languages for local radio transmission • Robust engagement with local CBOs, particularly in post COVID-19 scenario; during COVID-19 crisis, engagement using telephone, emails and other digital communication methods will be used • Resource allocation to ward representatives and councilors • Provision of transportation or transportation cost to attend meetings • 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 CBOs who work with vulnerable people at community level to help disseminate information and organise consultations
Female stakeholders (students, teachers and parents)	<ul style="list-style-type: none"> • The Project will arrange separate consultation sessions (e.g., meetings and focus group discussion), men and women separately • Smaller and gendered focus group discussions where women and girls feel more at ease to speak • The Project will use various communication measures, including women's associations or organisations, to reach out to female groups at district/chiefdom/village levels • The Project will use various measures – including sensitisation, community empowerment, and the provision of psychosocial counseling and support services – to address gender issues in education, such as advocacy and media campaigns and workshops on gender issues
Disabled stakeholders	<ul style="list-style-type: none"> • The Project will use various communication measures, such as engagement with the Disability Commission and NGOs that work with persons with disabilities, to reach out to disabled stakeholders • Information will be translated to sign language/Braille • Information will be shared through supporting organisations, online platforms and digital communications • District-/chiefdom-/village-level meetings

Target groups	Strategy
	<ul style="list-style-type: none"> Engagement of local NGOs and CBOs that work with vulnerable people at community level to help disseminate information and organise consultations For any face-to-face meetings in post-COVID-19 period, easily accessible venues will be used
Vulnerable/disadvantaged families, including OOSC	<ul style="list-style-type: none"> 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 families Project Community Liaison Officer/District MSWGCA Officers/Local councils/Ward Committees

4.4 Reporting back to stakeholders

14. Stakeholders will be kept informed as the Project develops, including reporting on Project environmental and social performance and the implementation of the stakeholder engagement plan and grievance mechanism, and on the Project's overall implementation progress. Written information and reports will be disclosed in English. Information will be disclosed using different formats – including public notices, press releases and the Project website. Consultation meetings and separate focus group meetings with vulnerable groups will take place as appropriate. Information will be disclosed as outlined in Table 5.

Table 5: 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 rationalisation	<ul style="list-style-type: none"> 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 analysed	Government officials, TSC, SLTU, school heads and teachers, CSO/NGO groups, SMCs	MBSSE

Project component	List/Type of information to be disclosed	Methods of disclosure proposed	Timetable/Frequency	Target stakeholders	Responsible stakeholders
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; posters in local councils and newspapers	Throughout the Project implementation	Students, parents, SMCs, communities, female teachers	MBSSE, Heads of schools
2. Teacher Management and Professional Development					
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 continuing professional development for teachers	Training information	Through district TSC and school heads, websites 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, boards of governors
3.2 Physical improvement to learning environment	ESMF, RBF/RAP, Stakeholder Engagement Plan, ESCP infrastructure improvement plan, construction schedule, GRM documents	Disclose in country in two local newspapers and on the GoSL and World Bank websites. Hard copies 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/boards of governors
3.3 School health	Number of schools receiving first aid kits	Website of MBSSE, posted on local council/community/social media	Twice during the implementation stage	Government and government-assisted primary schools and JSS; students, teachers, communities	MBSSE

Project component	List/Type of information to be disclosed	Methods of disclosure proposed	Timetable/Frequency	Target stakeholders	Responsible stakeholders
4. Project Management, Coordination and Monitoring and Evaluation					
4.1 Project management, coordination and monitoring and evaluation	Information on the Project results framework	GoSL 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/community notice boards	When strategy is developed, during school	Schools, civil society, heads, teachers	MBSSE, Schools, CSOs
	Sensitisation communication campaign: safe school protocols	Posted on local council/community 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	GoSL website, MBSSE website, posted on local council/community noticeboards, radios, social media and newspaper	Before schools reopen	Students, parents, heads, teachers, local community	MBSSE, Schools' boards of governors, SMC, MoHS, NACOVERC/EOCs, CSOs
6.4 Sustaining effective operations, planning and policy during post COVID-19 crisis	Radical inclusion policy, Information on the COVID-19 related outcomes	Report, MBSSE 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

Project component	List/Type of information to be disclosed	Methods of disclosure proposed	Timetable/Frequency	Target stakeholders	Responsible stakeholders
Component 7: Supporting and Reinforcing Foundational Learning for All					
7.1 Accelerating foundational learning competencies	Criteria for benefit and the number of government and government-approved schools receiving curricular package	School feedback form displayed in school board	Every term	Civil society, local communities, parents	TSC SLTU
7.2: Improving learning opportunities catering for OOSC	Information number of primary school-level OOSC and other vulnerable children receiving back to school incentives or learning support	School feedback form displayed in school board	Before and after disbursement of support	Teachers, civil society, parents	SMCs, boards of governors
7.3 Strengthening system to monitor	Information on component result framework	MBSSE website, MBSSE office noticeboards in all districts	Annually	Civil society; local councils; community monitoring groups	MBSSE and PFMU
7.4 NGO consortium supporting foundational learning and OOSC	Information on community sensitisation and capacity building; information on OOSC engagement in non-formal education programmes and alternative learning pathways	Posted on local council/community noticeboards, radios, social media, newspaper, through community leaders	Every term	OOSC, parents, civil society, local councils	NGO consortium

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources

15. Overall responsibility for the Project will lie with the MBSSE, which has a dedicated Project Implementation unit – Free Education Project Secretariat (FEPS) – that is responsible for day-to-day project management and coordination of Project activities. FEPS provides reports of Project progress to the Minister of Education and the World Bank. To function effectively, the Project Secretariat has at least the following contract officers on hand: (a) Head (coordinator); (b) Monitoring and Evaluation (M&E) Officer; (c) Programme Officer, (d) Environmental Specialist, (e) Social Safeguards Specialist, and (f) additional administration staff as needed.

Other functions, including communications and human resources, are 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. The SEP is incorporated into the Project Operations Manual and the Annual Work Plan and Budget.

16. Policy direction and oversight of the Project is carried out at national level by an MDTF Free Education Project Steering Committee. The committee reviews the overall performance of the Project and decides on important policy aspects to facilitate the achievement of outcomes and results. The Project Steering Committee meets biannually. The committee comprises the heads of the MBSSE, TSC, MoF, World Bank and MDTF-participating DPs. The committee is co-chaired by the GoSL (rotating chair between the MoF and MBSSE) and the World Bank. The COVID-19 Education Emergency Taskforce (EET) also advised and supported the GoSL's education activities during the COVID-19 pandemic and the post-COVID-19 period. The Strategic Coordination Unit of the EET is chaired by the Minister and includes the permanent secretary, heads of the EU, UNICEF, DFID, Irish Aid and the World Bank. A sub-component of Component 7 (7.4 *NGO Consortium Supporting Foundational Learning and OOSC*) will be implemented by the NGO Consortium, led by Save the Children and consisting of an additional six NGOs – International Rescue Committee (IRC), Community Awareness to Restore Lives (CARL), EducAid, National Youths Awareness Forum (NYAF), Concern Worldwide and Plan International.

5.2 Management functions and responsibilities

17. The entities responsible for carrying out stakeholder engagement activities are MBSSE and TSC, with the support of Free Education Project Secretariat (FEPS). The NGO Consortium implementing Sub-component 7.4 will also conduct stakeholder engagement activities related to OOSC. The stakeholder engagement activities will be documented through meeting notes, pictures of the event and email.

6. GRIEVANCE MECHANISM

6.1 Introduction

18. As part of the Project, a GRM reporting system has been developed for the education sector. Strengthening system accountability is a key outcome of the Project. To this end, the Project has established a grievance redress mechanism (GRM). The Project strengthened accountability for beneficiaries and provided channels for Project stakeholders to provide feedback on Project activities. It also provides a mechanism that allows for the identification and resolution of issues affecting the Project, including safeguard-related complaints, misconduct of staff, misuse of funds, abuse of power and other improper behavior. By increasing transparency and accountability, the GRM reduces the risk of the Project negatively affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve Project impact. Separate GRMs have been established by contractors during implementation to address employee grievances consistent with ESS 2.
19. The GRM established under the Project is 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; it is supported by an information campaign and training. While feedback is handled at the level closest to the complainant, all complaints are registered and follow the set procedures.

6.2 GRM scope and use

20. **Scope:** The Project includes a GRM that is available for Project stakeholders to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all Project-funded activities.

21. **Who Can Use The GRM?** Project beneficiaries, Project-affected people (i.e., those who 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 is no charge for making a complaint or conveying comments or suggestions.

6.3 Procedures

a. Establishment of Grievance Redress Committee/Body

22. The Grievance Redress Committee (GRC) at local level has been established by MBSSE, in consultation with other relevant parties to the Project. The membership of the GRC is comprised of representatives from the following:
- MBSSE
 - Local contractors
 - Local Council Environmental and Social Officer
 - NGOs/CSOs
 - Persons with Disabilities Association
 - Project Social Safeguards Specialist (will be co-opted when necessary)
 - M&E officer of the Project Secretariat.

b. Channels to make complaints

23. The Project established the following channels through which citizens/beneficiaries can make complaints regarding Project activities:
- A dedicated email address: complaints@education.gov.sl
 - A dedicated toll-free phone line: 8060
 - On the Project website: www.grm.icgs.xyz
 - Feedback boxes located at MBSSE District Offices, local councils and remote locations with sub-projects
 - Letters sent to suggestion boxes in schools and MBSSE offices
 - 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.)
 - Constitution of Grievance Committee members (which include women)
 - Project meetings set up at implementation level, each of which include women
 - Oral language interpreters for lodging complaints.
24. The Project ensures flexibility in the channels available, making 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

25. Complaints may be made anonymously, and confidentiality is 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 are taken out from the grievance form. To ensure this, multiple channels to make a complaint have been established and conflicts of interest are avoided.

d. Collection/receipt of complaints

26. The GRM focal person receiving the complaint at local level, completes 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 are collected and compiled by the Free Project Secretariat on a regular basis.

e. Sorting/categorisation

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

Table 6: Classification of Complaints

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

28. Once the complaints have been categorised and submitted to the FREE Education Secretariat, the Social Safeguards Specialist logs the details regarding the complaint into the tracking system. GRM files are stored in a secure setting (password-protected IT database or locked storage cabinet for hard copies).
29. For grievances that cannot be resolved at local level, once a complaint has been logged and sorted, the Project's Social Safeguards Officer works closely with Social Project Coordinator in determining the following:
- The person responsible for investigating the complaint
 - The timeframe within which the complaint should be resolved
 - The agreed course of action (e.g., investigation, reply not requiring investigation, etc.).
30. Generally, the investigation process assumes three stages and is determined based on the nature and gravity of the complaint. However, regardless of type/category of complaints, all complainants are assured of receiving feedback within ten business days. For resettlement-related complaints, regardless of the complexity of the

case, the Social Safeguards Specialist with the Project Secretariat are involved in the conduct of the investigation.

Stage one

31. For local-level complaints, the investigation is conducted by assigned GRM focal persons with the support of the GRC within five days. Using the findings of the investigation, the GRC decides on a resolution and informs the complainant of the outcome. The GRM focal person informs the Project Social Safeguards Specialist of the decision and outcome, for documentation purposes.

Stage two

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

Stage three

33. In circumstances where grievances cannot be investigated and resolved by the GRM focal persons, GRCs and MBSSE District Offices, they are referred to the Secretariat of the FREE Education Project, where a GRC made up of the following representatives investigates and decides on a resolution:
 - MBSSE – district and headquarters
 - Local contractors
 - Local Council Environmental and Social Officer
 - NGOs/CSOs
 - Persons with Disabilities Association
 - PFMU
 - Project Coordinator
 - Project Social Safeguard Specialist
 - Any other persons or group that may be relevant to the resolution of the grievance.
34. When determining who will be the investigating officer, the Project Secretariat ensures that there is no conflict of interest, i.e., all persons involved in the investigation process should have no material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.
35. Once the investigation process has been established, the person responsible for managing the GRM records and enters this data into the logbook.
36. The number and type of suggestions and questions are recorded and reported so that they can be analysed to improve Project management and communications.

g. Notification to the complainant

37. If the complainant is known, the Project Secretariat communicates the timeframe and course of action to her/him by phone, email or mail, within two weeks of receipt of the grievance¹. If the complainant is not known,

¹This 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.

then the course of action is logged in the logbook, but no effort is made to find the complainant. Where the complainant's address is available, this is provided in writing with a tracking number and the deadlines by which they hear back from the GRC or Project Secretariat (see Annex 3 Notification Form and Annex 4 Acknowledgement Form).

h. Investigation

38. The person responsible for investigating the complaint gathers 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).
39. 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 is referred to other administrative bodies (such as the Ministry of Labour, Office of the Ombudsman and other options available to complainants, including the legal system).
40. There are special procedures for managing GBV complaints, including confidential reporting with safe and ethical documenting of such cases, given the need to ensure a survivor-centred approach to resolution. Therefore, complaints are investigated and resolved by the GRC, but through special arrangements put in place that link survivors with specialised NGO service providers, procured under the Project to manage GBV cases. Survivors are also linked to other service providers, such as the Ministry of Gender and Children's Affairs' One-Stop-Centres, where appropriate.
41. The results of the verification and the proposed response to the complainant are 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 2), along with the details of the investigation and the findings, and enters it into the Management Information System (MIS).

i. Response to complainant

42. If the complainant is known, the Project Secretariat communicates the proposed action to them via letter, email, or verbally, to be received within ten days. The complainant will also be informed with regard to whom and how they can appeal the action decided in the initial case.
43. The Project Secretariat requests feedback from the complainant as to whether they deem the action(s) satisfactory, and this is recorded along with the details of the complaint and the response taken.

j. Possibility to appeal

44. In the event the complainant is satisfied with the response, discussions are held in groups or individually to further clarify the positions at stake. Senior management takes part in these meetings and a final decision on the action(s) is made.
45. The Project Secretariat forms a Grievance Committee that hears appeals. The Grievance Committee is 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 are agreed prior to its format.

46. The complainant is not precluded from appealing outside the Project/Project Secretariat GRM² if they are not satisfied with the proposed response.

6.4 Awareness-building

a. Information provided in an accessible format

47. Information about the grievance handling system has been 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 were also 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 campaigns.

b. Proactive advertisement/regular public information campaigns

48. Information campaigns were designed by the Project Secretariat before Project commencement, to encourage the use of the GRM. The campaigns use local media (e.g., TV, newspapers, radio). When organising and conducting these campaigns, special efforts were made to reach vulnerable groups. The campaigns 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 is reported as part of the Project's routine quarterly reporting. Also, a summary of implementation of the grievance mechanism is provided to the public annually, after removing identifying information on individuals to protect their identities.

6.5 Staffing and capacity-building

a. Roles and responsibilities

49. The Project Secretariat manages GRM in-house. These were 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/categorisation of complaints
 - Investigation
 - Decision-making based on the investigation results
 - Processing appeals
 - Publishing responses to complaints
 - Organisation and implementation of information materials and awareness campaigns
 - Budgeting of the GRM
 - Reporting and feedback on GRM results.

b. Capacity-building

² An alternate dispute mechanism, such as a court of elders or to the formal legal system.

50. Training for all relevant staff and relevant stakeholders is held annually, or as otherwise agreed. New staff receive training as a regular part of the onboarding process. The training includes all aspects of the GRM set out in this section. All training courses include information on the GRM principles and procedures. The training puts emphasis on accountability to the complainant. A key focus at the outset is shifting from informal complaint resolution to the logging of all complaints/feedback into this system.
51. Dedicated training is 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

52. 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

53. The Project Secretariat assesses the functioning of the GRM and undertakes spot checks during regular supervision visits. The Project Secretariat works 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.
54. During annual/bi-annual general meetings, the Project team discusses and reviews the effectiveness and use of the GRM and gathers suggestions on how to improve it.

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

55. Quarterly and annual progress reports 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

56. The status of the development of the GRM, the levels of use by beneficiaries/citizens, the challenges of implementation, etc., are discussed in semi-annual/annual portfolio meetings. The Project Secretariat discussed with the Bank during implementation missions any corrective measures that may be needed.
57. 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 Summary of how SEP implementation will be monitored and reported

58. The M&E activities 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 have been incorporated into the MBSSE EMIS and are 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 work closely with the MBSSE to ensure data collection, cleaning, analysis, and reporting are completed according to the Project requirements.
59. 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 and school infrastructure, are 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.
60. The Free Project Secretariat, with support from Social Safeguards Officer and M&E officer, are 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 are required throughout the Project duration at established intervals: (a) annual work plan on Project implementation by component and sub-component, 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 is reviewed regularly, including through biannual implementation support and supervision mission led by the World Bank.
61. The World Bank provides implementation support and supervision during the Project implementation period. Implementation support and supervision missions are undertaken at least every six months and monitoring and reporting on progress made under the Project through the implementation status and results reports (ISRs). The World Bank also reviews 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.
62. Monitoring and evaluation under the Project relies on each level of the education system— from school level to local and central levels. The MBSSE is responsible for ensuring effective monitoring processes are adopted and that the information flow is smooth, reaching the relevant stakeholders on time. Steps have been taken to ensure that each feedback mechanism established under the Project can provide timely data to the local-level stakeholders. The Project maintains a strong GRM given the Project's reliance on community inputs for effective implementation and achievement of Project outcomes. Information on the GRM is provided in the

context of SMC and school-level training. The Project secretariat is responsible for timely response to any grievances received.

7.2 Reporting back to stakeholder groups

63. The SEP will be periodically revised and updated as necessary in the course of Project implementation. Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the Project. The quarterly summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

ANNEX 1: STAKEHOLDER ENGAGEMENT ACTIVITIES CONDUCTED DURING PROJECT IDENTIFICATION AND PREPARATION STAGE

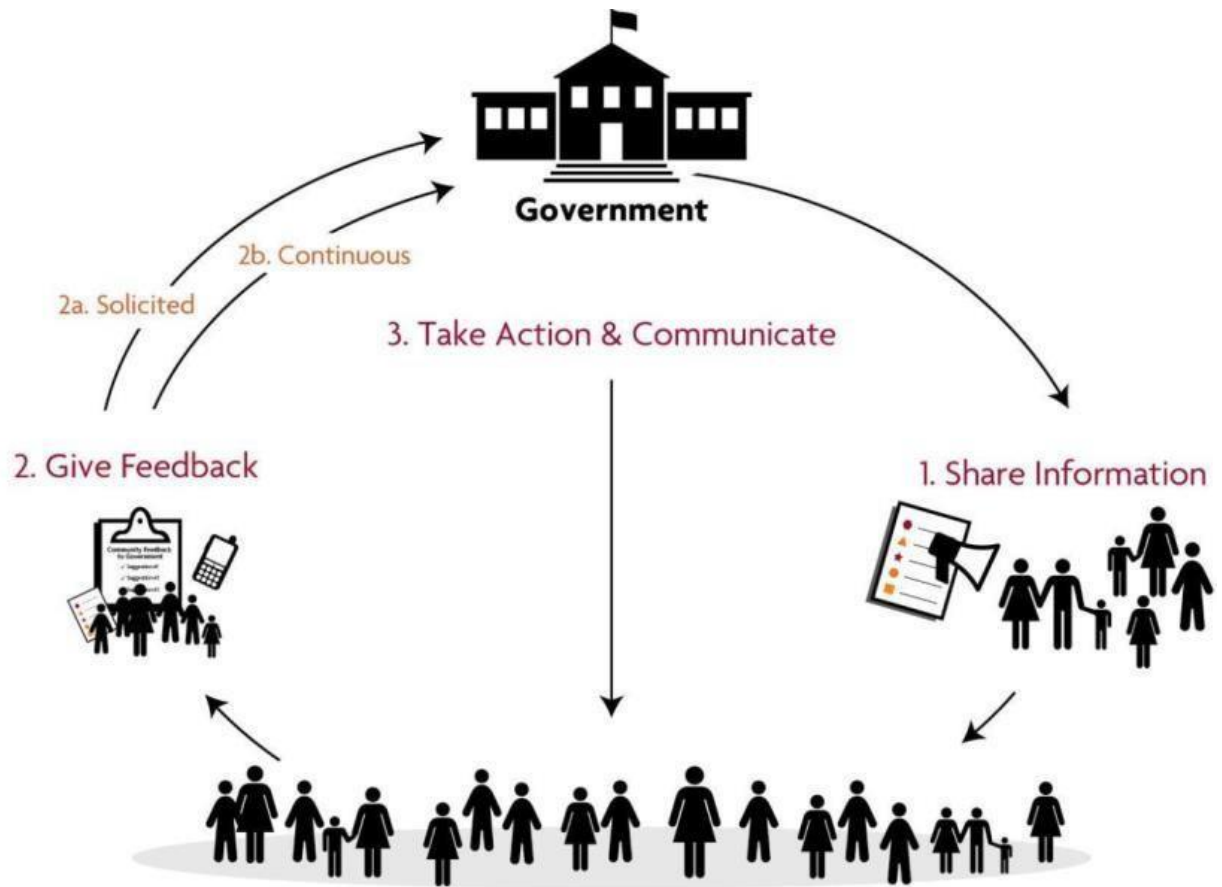
Stakeholder	Main topics discussed
MBSSE	<ul style="list-style-type: none"> Challenges facing the MBSSE Goals/objectives MBSSE wants to achieve Strategies to achieve the goals Indicators the MBSSE wants to use to measure attainment of the goals (results framework) Monitoring mechanism for the Project Implementation arrangement for the Project A whole school approach
MoF	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Challenges facing the PFMU Aspects that need improvement to enhance the operations of PFMU
Local Government Finance Department (LGFD)	<ul style="list-style-type: none"> Educational decentralisation work in the country Roles and responsibilities devolved to local level
TSC	<ul style="list-style-type: none"> 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) A whole school approach
WAEC	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> • Educational decentralisation work in the country • Roles and responsibilities devolved to local level • Monitoring of schools by LCs • How LCs support education activities • A whole-school approach • 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	<ul style="list-style-type: none"> • Educational decentralisation work in the country • Role of District Education Officers (DEOs) • Interaction between DEOs and schools • How the DEOs support education activities • How the DEOs work with LCs • Existing committees at district level
School heads	<ul style="list-style-type: none"> • Does SMC function well? • How the performance-based grant works • Challenges facing schools • Monitoring visits by inspectors, supervisors, local councils, district education offices, local TSC • Community support in school management • Main reasons that children drop out of school • Supply of teaching and learning materials (e.g., textbooks) • Effects of the Free Quality Education Programme 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 • A whole-school approach
Teachers and Sierra Leone Teachers' Union	<ul style="list-style-type: none"> • Challenges facing schools • Competences and qualifications of teachers • Monitoring visits by inspectors, supervisors, local councils, district education offices, local TSC

	<ul style="list-style-type: none"> • Community support in school management • Reasons that children drop out • Supply of teaching and learning materials (e.g., textbooks) • Effects of the Free Quality Education Programme 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? • A whole-school approach
Teacher Training Institutions (TTIs)	<ul style="list-style-type: none"> • 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?

ANNEX 2: FEEDBACK LOOP

Figure 1. Feedback loops created between government and stakeholders



ANNEX 3: GRIEVANCE FORM

GRIEVANCE/INQUIRY RECORD <i>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.</i>				
Date Grievance Received:			Name of Staff Completing Form:	
Grievance Received (check <input checked="" type="checkbox"/>): <input type="checkbox"/> National <input type="checkbox"/> District <input type="checkbox"/> Chiefdom				
Mode of Filing Inquiry or Grievance (check <input checked="" type="checkbox"/>): <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone Text Message <input type="checkbox"/> Website <input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other _____				
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i> Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>				
Location where grievance/problem occurred [write in]				
National:	District:	Chiefdom:	Others:	Others:
Brief Description of Grievance or Inquiry: <i>(Provide as much detail and facts as possible)</i>				
	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 4: NOTIFICATION FORM

GRIEVANCE ACKNOWLEDGEMENT	
Instructions: This form is to be completed by the Free Project Secretariat and mailed or delivered to the complainant.	
Date Grievance Received:	Tracking Number:
Grievance Received (check v): <input type="checkbox"/> National <input type="checkbox"/> District <input type="checkbox"/> Chieftdom	
Mode of Filing Inquiry or Grievance (check v): _____ <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone Text Message <input type="checkbox"/> Website <input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other	
Name of Person Raising Grievance: (information is optional and always treated as confidential)	
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	
Contact information for the Person Raising Grievance: <i>(information is optional and confidential)</i> Email: Phone: Address:	