MINISTRY OF INFORMATION AND COMMUNICATIONS



REPUBLIC OF SIERRA LEONE

SIERRA LEONE DIGITAL TRANSFORMATION PROJECT (P177077)

RESETTLEMENT POLICY FRAMEWORK (RPF)

FINAL DRAFT

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ACRONYMS

ACC	Anti-corruption Commission
ACE	Africa Coast to Europe
AT	Assistive Technology
CAP	Common Alerting Protocol
CE	Citizen Engagement
CERC	Contingent Emergency Response Component
CII	Critical Information Infrastructure
CIIP	Critical Information Infrastructure Protection
CISOs	Chief Information Security Officers
CREST	Climate Resilience and Environmental Sustainability
CSO	Civil Society Organizations
DE4A	Digital Economy for Africa
DIAL	Digital Impact Alliance
DP	Displaced Persons
E&S	Environmental and Social
E&S	Environmental and Safeguards
EA	Enterprise Architecture
EI	Economic Inclusion
EIA	Environmental Impact Assessment
EOC	Emergency Operation Centre
ERM	Emergency Response Manual
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
EWS	Early Warning Systems
FM	Financial Management
G2B	Government-to-Business
G2G	Government-to-Government
G2P	Government-to-Person
GBV	Gender-based Violence
GoSL	Government of Sierra Leone
GRM	Grievance Redress Mechanism
GSP	Government Service Platform
GSP	Government Service Platform
GVWC	Guma Valley Water Company
GWAN	Government Wide Area Network
ILO	International Labour Organisation
IPV	Intimate Partner Violence

IRU	Indefeasible Rights to Use
LIPW	Labour-intensive Public Works
M&E	Monitoring and Evaluation
M&E	Monitoring and Evaluation
MFD	Maximizing Finance Development
N-CIRT	National Computer Incident Response Team
NaCSA	National Commission for Social Action
NAYCOM	National Youth Commission
NCCC	National Cybersecurity Coordination Centre
NGO	Non-Governmental Organization
NGOs	Non-Government Organisations
OPD	Organisation for Persons with Disabilities
PAD	Project Appraisal Document
PAPs	Project Affected Person
PCU	Project Coordination Unit
PDO	Project Development Objectives
PIAF	Public-Private Infrastructure Advance Facility
PKI	Public Key Infrastructure
PMU	Project Management Unit
PPP	Project Preparation Advance
PSC	Project Steering Committee
PWD	Persons with Disabilities
RAP	Resettlement Action Plan
RCA	Replacement Cost Approach
RPF	Resettlement Policy Framework
SALCAB	Sierra Leone Cable Limited
SALWACO	Sierra Leone Water Company
SEP	Stakeholder Engagement Plan
SLDHS	Sierra Leone Demographic
SLDTP	Sierra Leone Digital Transformation Project
SLIXP	Sierra Leone Internet Exchange Point
SMP	Significant Market Power
SOP	Standard Operating Procedures
SSL	Statistics Sierra Leone
TA	Technical Assistance
TOR	Terms of Reference
UNDP	United Nations Development Programme
UNFPA	United Nations Population Fund Activities
WDR	World Development Report

GLOSSARY OF KEY TERMS

Asset: Any property owned by a person, group of persons or an institution/ agency.

Census: A field survey carried out to identify and determine the number of Project Affected Persons (PAPs) or Displaced Persons (DPs) as a result of land acquisition and related impacts. The census provides the basic information necessary for determining eligibility for compensation, resettlement, and other measures emanating from consultations with affected communities and the local government institutions.

Community: A group of individuals broader than the household, who identify themselves as a common unit due to recognized social, religious, economic, or traditional government ties, or through a shared locality.

Compensation: The payment in kind, cash or other assets given in exchange for the acquisition of land or restriction on land use including fixed assets; and other assistance to rehabilitate or cushion the impacts from displacement.

Cost of disturbance: the reasonable expenses incidental to any necessary change of residence or place of business by any person having a right or interest in the land. This can either be determined and paid separately or factored into the valuation rate to be applied.

Cut-off Date: The date of commencement of the census of persons affected by the project within the project area. This is the date on and beyond which any person whose land is occupied for project use will not be eligible for compensation.

Displacement: Dispossessing someone of their land or part of their land to utilize the same for civil works. The affected person is required to relocate.

Displaced Persons: People or entities directly affected by a project through the loss of land and the resulting loss of residences, other structures, businesses, or other assets.

Economic Displacement: Loss of income streams or means of livelihood resulting from land acquisition or obstructed access to resources (land, water, or forest) which results from the construction or operation of a project or its associated facilities.

Eligibility: The criteria for qualification to receive benefits under a resettlement program.

Entitlements: The benefits set out in the resettlement instruments (RPF, RAP), including financial compensation; the right to participate in livelihood restoration programs; housing, house sites and service provision; and transport and other short-term assistance required to resettle or relocate.

Full Replacement Cost: The method of valuation of assets that helps determine the amount sufficient to replace lost assets and cover transaction costs associated with asset replacement. In applying this method of valuation, depreciation of structures and assets are not considered.

Grievance Procedures: The processes established under law, local regulations, or administrative decision to enable property owners and other affected and/or displaced persons to redress issues related to acquisition, compensation, or other aspects of resettlement.

Involuntary Resettlement: Resettlement is involuntary when it occurs without the informed consent of the displaced persons or if they give their consent without having the power to refuse resettlement.

Land Acquisition: This refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include: (a) acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible. "Land" includes anything growing on or permanently affixed to land, such as crops, buildings, small structures, and other improvements, and appurtenant water bodies.

Livelihood: This refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade and bartering.

Market Value: the sum of money which the land might have been expected to realize if sold in the open market by a willing seller or to a willing buyer.

Physical Displacement: Loss of shelter, structures permanently affixed to land, crops, and other assets resulting from the acquisition of land or restrictions on land use associated with a project that requires the affected person(s) to move to another location.

Project-Affected Person (PAP): A person that loses assets and/or usage rights and/or income generation capacities (e.g., land, structures, crops, businesses) because these assets/rights/capacities are located in land to be acquired or restricted or leased or used for needs of the Project, or a person who belongs to a household negatively impacted by the project.

Population Census: A count of the population that will be affected by land acquisition and related impacts. When properly conducted, the population census provides information necessary for determining eligibility for compensation.

Relocation: A process through which physically displaced individuals or households or communities are provided with compensation payment for their existing residential structures and assets and with livelihoods' restoration support where required and move from the Project Area.

Resettlement: A process through which physically displaced persons are provided with replacement plots and residential structures at a designated site. Resettlement includes initiatives to restore and improve the living standards of those being resettled.

Resettlement Action Plans (RAPs): A resettlement instrument to prepare when the location(s) of civil works are identified. RAPs contain specific and binding provisions to resettle and/or compensate the affected persons before implementation of the activities.

Resettlement Assistance: refers to activities that are usually provided during, and immediately after relocation, such as moving allowances, residential housing, or rentals or other assistance to make the transition smoother for affected households.

Resettlement Policy Framework (RPF): An instrument prepared to guide resolution of displacement arising from project activities. It sets out the compensation policy and resettlement arrangements to address the needs of the affected persons to ensure that their livelihoods are restored to pre-project levels or better. It provides guidelines to prepare the mitigation plans.

Stakeholders: A broad term that covers all parties affected by or interested in a project or a specific issue—in other words, all parties who have a stake in the project. Primary stakeholders are those most directly affected—in resettlement situations, the population that loses property or income because of the project. Other people who have interest in the project itself, beneficiaries of the project, etc. are termed secondary stakeholders.

Vulnerable Persons: People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Executive Summary

Overview

The Government of Sierra Leone (GoSL), in implementing the proposed Sierra Leone Digital Transformation Project (SL DTP), is committed to complying with Sierra Leonean laws and the World Bank Environmental and Social Standard 5 (ESS 5) on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. The purpose of developing a Resettlement Policy Framework (RPF) at this stage of the Project is to outline the framework and principles for execution of the Project compensation/ relocation/resettlement and livelihood related issues for Project Affected Persons (PAPs) as early as possible in project development. This will allow for early and effective disclosure to key stakeholders, and subsequent feedback and inputs, prior to development of a main Resettlement Action Plan (RAP) for subproject activities.

Project Development Objectives and Project Components

The Project Development Objective is to expand access to broadband internet, enhance digital skills and improve government capacity to deliver public services digitally. This will be achieved through five integrated and mutually reinforcing components. Component 5 is reserved for project management and implementation support, while Component 5 is dedicated to contingent response to future emergencies (Contingent Emergency Response Component, CERC) aimed at mobilizing unallocated funds from the project to rapidly respond to emergency situations. Both the project design and implementation plan have accounted for COVID-19's impact on the economy.

Component 1: Expanding Digital Access, and increasing Resilience of the Digital Environment

This component aims to improve broadband market efficiencies and competition, expand access to broadband internet, and foster inclusive digital connectivity by addressing existing digital divides in Sierra Leone. Investments for improving regulatory tools and capacity will result in increased market competition, attract private sector investment, and lower internet prices. Also, financing a series of interventions will support greater technology adoption and address both supply- and demand-side constraints to achieve productive and meaningful use of digital technology. The last-mile connectivity support will provide quality broadband internet to selected public institutions. Moreover, this component will address inclusive access and minimizing digital divides in a multifaceted manner, particularly focusing on empowering the persons with disabilities (PWDs), women and people in rural and remote areas. This component will also support to increase the overall resilience of digital environment by enhancing cybersecurity and climate resilience.

Component 2. Digital Skills Development and Innovation

This component aims to tackle Sierra Leone's digital literacy gap by offering digital literacy training for marginalized youth to develop and utilize digital skills to improve their livelihoods and address challenges in their communities. The project will support the most vulnerable youth (i.e., those living under the poverty line), women, and PWDs by enabling their participation in online and in-person digital skills training courses, thereby increasing their employment opportunities. All activities will adopt gender-inclusive and disability-inclusive strategies for recruiting and retaining beneficiaries, including accessible locations and assistance for childcare or transportation. Given that digital skills agenda is nascent in Sierra Leone, the design information digital literacy trainings will be based on a robust and detailed market assessment on the supply

and demand of digital skills as well as the analysis on the potential of the gig economy encompassing online freelancing and microworks.

Component 3. Laying Key Foundations for Digital Government Services and Systems
This component aims to build the core infrastructure and institutional capacity necessary to enable digital public service delivery and to enhance the Government's operational efficiency. At present, the GoSL lacks sufficient policies, institutional and coordination capacity, and underlying infrastructure to implement these building blocks and implement citizen-centric digital services in a secure, reliable, and cost-effective manner. For example, the lack of robust interconnection between MDAs and among central government offices and local councils poses a significant challenge to accelerate digital transformation in the government. The project will focus on strengthening the enabling environment where the building blocks of digital government will be implemented without duplication across various MDAs, strengthening the fundamental infrastructure and connectivity networks for digital government service delivery, and demonstrating selected Government-to-Government (G2G), Government-to-Person (G2P), and Government-to-Business (G2B) digital services and systems.

Component 4: Project Management and Implementation Support
This component will finance the Borrower's project management and coordination capacity, including procurement, financial management (FM), monitoring and evaluation (M&E), environmental and social (E&S) safeguards management, project communication, and citizen engagement. This component will also cover modest office equipment and independent audits and learning/training for key beneficiaries (e.g., PCU staff and the Technical Committee) to support the public sector's ability to build and retain skills for implementing whole-of-government digital transformation.

Component 5: Contingent Emergency Response Component (CERC)
In the context of the COVID-19 crisis, a Contingent Emergency Response Component (CERC) is added to the project structure to provide support to the Government to swiftly respond to an eligible crisis, including climate or natural disasters and public health emergencies. Including CERC at the preparation stage, albeit with zero funding, provides for flexibility for an agile response to an imminent or actual emergency (such as COVID-19) through quick disbursement of uncommitted balances from other components.

Brief description of project component for involuntary resettlement may be required
Sub-components 1.2 (last mile connectivity access to public institution), 1.3 (rural connectivity access) and 3.2 (establishment of digital access points) will support minor works that may be associated with last-mile connectivity, installation of digital infrastructure in selected public institutions at the central and local levels, including government offices, local councils, hospitals, schools, expanding access to broadband internet in selected rural areas and establishment of digital access points. It is expected that, minor land acquisition and temporal displacement will occur during these interventions. No physical or economic displacement are expected. The location for these interventions is undetermined at the moment. The RPF will therefore clarify resettlement principles, organizational arrangements, and design criteria to be applied to subprojects or project components to be prepared during project implementation when sub-project locations are determined.

Objectives of the RPF

The objectives of the RPF are:

- To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.
- To avoid forced eviction
- To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.
- To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant; and
- To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

Principles and objectives governing resettlement preparation and implementation

The principle underpinning the preparation and implementation of the resettlement instrument is to minimize avoid resettlement impacts to the extent possible. When land acquisition cannot be avoided, the Borrower will offer affected persons compensation at replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living or livelihood. Compensation payment will happen prior to land acquisition. PAPs need not have recognized and formal legal to be eligible for compensation and other resettlement assistance. As the nature and objectives of the project may allow, the Borrower will also provide opportunities for affected persons to derive appropriate development benefits from the project. Resettlement plans will be based on meaningful consultation and public disclosure of project related information and institution of grievance mechanism for resettlement related complaints.

Description of the process for preparing and approving resettlement plans

The resettlement preparation process will begin with screening of subprojects/ activities to determine if there is need for the preparation RAP. A sample screening checklist is provided in the project ESMF. Once a sub project triggers involuntary resettlement, a RAP will be prepared proportionate to the magnitude of displacement and the level of significance of the anticipated resettlement impacts. The preparation of a RAP will commence immediately after the cut-off date has been declared and disseminated to the PAPs and other relevant stakeholders. The preparation of resettlement instruments will involve census and socio-economic survey of PAPs, inventory and valuation of impacted assets as well as stakeholder engagement/consultation. The draft RAP will be submitted to the World Bank for review and clearance, after which it shall be disclosed by the Ministry of Information as well as the World Bank. Subsequently, it will be implemented, monitored prior to commencement of civil works. A RAP completion report will be prepared to

evaluate the success of RAP implementation and impact on PAPs as well as document any lessons learnt and feedback.

Estimated displacement impacts and estimated numbers and categories of displaced persons, to the extent feasible.
The extent of resettlement impact cannot be estimated at this point. However, some potential impact will include minor land acquisition during construction of transmission lines and installation of fibre optic cable. Minor loss of crops depending on the season. Business owners, operators and petty traders operating within selected sub-project sites.

Eligibility criteria for defining various categories of displaced persons
Affected persons who are eligible for coverage under the RPF include (a) persons who have formal legal rights to land or assets; (b) persons who do not have formal legal rights to land or assets but have a claim to land or assets that is recognized or recognizable under national law; or (c) persons who have no recognizable legal right or claim to the land or assets they occupy or use. The census will establish the status of the affected persons and their entitlement for assistance.

Country Legal Framework on land administration and resettlement related issues
Several policies and laws were reviewed to develop the RPF including:

- Constitution of Sierra Leone, 1991
- Protectorate Land Ordinance, 1927
- Provinces Land Act, 1960
- Town and Country Planning Act, 1960
- State Lands Act, 1960
- Forest Act
- Wildlife Conservation (amendment) Act of 1990
- National Lands Policy, 2015
- National Resettlement Policy 2010

Applicable World Bank Environmental and Social Standards
The applicable World Bank Environmental and Social Standards for the preparation and implementation of this RPF include:

- ESS 1-Assessment and Management of Environmental and Social Risks and Impacts
- ESS 5 – Land Acquisition, Restrictions on Land use and Involuntary Resettlement; and
- ESS 10 - Stakeholder Engagement and Information Disclosure.

Reviewing the fit between borrower laws and regulations and Bank policy requirements
Any impact of the SL DTP on land and/or people (land acquisition, restrictions on land use, physical displacement/resettlement, and livelihood restoration of affected people) will be addressed in compliance with the Constitution of Sierra Leone, with other regulations, and the World Bank ESS5 –Land Acquisition, Restrictions on Land use and Involuntary Resettlement. There are however some gaps between Sierra Leonean regulations and World Bank ESS 5 related to timing of compensation payment, eligibility for squatters, resettlement assistance, treatment of vulnerable groups etc. These are summarized on table below 2-1. Where there is discrepancy

between national policy and the World Bank ESS5, under this project, gap filling measures have been identified and the World Bank ESS5 will apply in accordance with this RPF.

Organizational procedures for delivery of compensation and other resettlement assistance
Resettlement planning and implementation will be the responsibility of the Ministry of Information and Communications (MIC). The project environment and social specialist will screen each sub project site for resettlement impacts, prepare Terms of Reference for RAPs, and review and disclose RAPs. The E&S specialist will also monitor the implementation of the RAPs. The project will contract a consultant to prepare the RAP. Implementation responsibilities are detailed in this RPF. The main institutions involved with the implementation of the resettlement activities are:

- Ministry of Information and Communications (MIC)
- Local and City Council
- Environmental Protection Agency
- Ministry of Lands, Housing and Country Planning
- Ministry of Finance
- Ministry of Justice

Description of the implementation process, linking resettlement
All PAPs and Project Affected Households (PAH), without regard to legal status of property, will receive support of various kinds, as per the principles set out in the Entitlement Matrix, to assist them in their efforts to maintain their livelihoods and living standards prevailing prior to the project. Squatters will not be compensated for loss of land but will receive compensation for loss of other assets which had been established with their own finances, and for loss of income such that they are assisted in their efforts to maintain their livelihoods and well-being. Detailed measures to be implemented will be determined based on the census and socioeconomic survey conducted when the ARAP/RAP is developed. Compensation will be paid at replacement cost/value to respective PAP at least 30 days prior to construction commencement so that PAP have sufficient time to remove or relocate their affected structure. Likewise, PAP will be notified 30 days prior to date of construction commencement.

Grievance Redress Mechanism
Grievance Redress Mechanisms will be established at the Project Coordinating Unit of the Ministry of Information and Communications to receive, evaluate and facilitate the resolution of project affected persons concerns related to the valuation of assets, amount of compensation paid, level of consultation, non-fulfilment of contracts and timing compensation, among others, to ensure transparency and accountability at all stages of preparation and implementation. Stakeholders will be able to channel their concerns, questions, and complaints to the various implementation agencies, through multiple grievance uptake channels. The GRM makes provision for complaints to be made through walk-ins to local councils, MIC offices, a toll-free hot-line managed by the ACC's call center, and the web-based platform by MIC GRM. The PCU will sign MOU with ACC. Once complaints are received at any levels, they will be forwarded the call or report centre (with customized MIC project website) for sorting, for the attention of the GRM committee or the appropriate bodies, persons or pillar leads for resolution and tracking of resolution process. Complainants will still have uninhibited access to legal redress mechanism through the Sierra Leone's judicial or appropriate administrative system.

Description of mechanisms for consultations

The project held consultation with key stakeholders during preparation of the RPF on the potential resettlement impact and mitigation measures. Consultations were held between 20th April 2002 and 6th May 2022. Key stakeholders engaged include the Ministry of Information and Communications (MIC); Ministry of Lands, Housing and Country Planning; Ministry of Finance; Environment Protection Agency (EPA); National Telecommunication Commission (NATCOM), Universal Access Development Fund (UADF); Independent Media Commission (IMC); National Commission for Persons with Disability; Dorothy Springer Trust; Telecoms (Orange, Africell, QCell, Sierratel); Private Sector, Traditional Authorities, Communities and Students (schools and Universities). Key issues from the consultations include: the proposed project is accepted in general as it will leapfrog the country into the right development trajectory; involvement of community/stakeholders in established responsible bodies, such as GRM; the need for awareness raising/training with respect to the implementation of ESS5 at the community level as well as implementers (especially entitlement and grievances redress with community) was stressed; local councils are critical to the successful implementation of the project; the project will positively impact data management, education, businesses and banking sector, risk mapping and assessment, e-waste management and disaster risk reduction through the strengthening of the early warning system; and the expansion of the use of internet among civil and public officials of the Ministries, Department and Agencies will increase efficiency and effectiveness in service delivery.

Detailed information on consultation and engagement is provided in the project stakeholder engagement plan. Consultations with stakeholders including PAPs will be an integral part in the RAP preparation, implementation and monitoring processes at all stages and stakeholders should have access to the RAP. Consultations would happen in local language as much as possible; women will be consulted separately if that is more appropriate. The consultation process would ensure sizeable participation of women, youth, and the vulnerable groups at risk of exclusion, and also ensure prior distribution of project information in a form that is accessible to community members.

Monitoring and Evaluation

Arrangements for monitoring would fit within the overall monitoring plan of the SL DTP. The MIC through the Project Coordination Unit (PCU) will undertake regular field visits to subproject sites, maintain a dialogue with affected persons and ensure that consultations are conducted regularly and effectively. The report of monitoring results will be prepared by MIC and submitted to the World Bank on a quarterly basis to review the progress of the safeguards implementation of resettlement activities and any other compliance issues and corrective actions adopted. The reports will closely follow the involuntary resettlement monitoring indicators agreed at the time of resettlement plan approval.

Budget and Funding

The indicative cost of the RPF/RAP implementation is estimated at **182,600 USD** for five years.

Stakeholder Engagement Activities	Quantity	Times/ Years	Total Cost (USD)	Remarks
Community Sensitization meetings with Local communities and traditional authorities on the RPF	Lump sum	1	10,000	MIC and other national stakeholders, including CSOs, NGOs radio discussion, disclosure of RPF-report to stakeholders
Training and sensitization of Local & District Councils on RFP and WB ESS5	Lump sum	1	15,000	One training session per district involving local consultant
Publication of disclosure notice of the RAP(s) on website of relevant institutions, in at least two widely circulated national newspapers	2		1,000	Production and disclosure RAP documents, Stakeholder workshops
Awareness creation on local/community radios	Lump sum		10,000	Payment for airtime or jingles aired on community radio in each district
Preparation of RAP	Lump sum		30,000	Local Consultant
Internal Monitoring of RAP Implementation	Lump sum		30,000	Local consultants – allowances
External/Independent RAP Implementation monitoring and evaluation	Lump sum		50,000	International/local consultants' study/assessment per district.
Formation and training of community RAP grievance committees and GM awareness	Lump sum		20,000	International/local consultants per district involving training of beneficiaries and other stakeholders – GRM, disabled, gender and other vulnerable groups
Subtotal			**166,000**	
Contingency (10%)			16,600	
Total			**182,600**	

Arrangement for Funding for Resettlement

If any project activity is deemed to cause displacement during implementation, MIC will seek approval from the World Bank to use project funds to pay compensation. RVP memo will be prepared at that point based on the approved RAP estimates to seek approval for use of project funds to pay compensation.

1 INTRODUCTION

1.1 Background

This document is the Resettlement Policy Framework (RPF) to be used under the Sierra Leone Digital Transformation Project (P177077) (SLDTP). The RPF provides guidance to the Ministry of Information and Communications (MIC) regarding resettlement objectives, principles of resettlement, organizational arrangements and criteria for designing any resettlement plans to be applied to activities implemented under SLDTP. The RPF will be implemented on a national scale and will rely on legal and institutional arrangements and mechanisms already in place. The RPF has been developed in full compliance with Government of Sierra Leone (GoSL) regulations and the World Bank's Environmental and Social Framework (ESF), specifically the objectives of Environmental and Social Standard (ESS5) – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.

This RPF will be applicable to the Sierra Leone Digital Transformation Project implemented by the Ministry of Information and Communications (MIC) and financed through World Bank Investment Project Financing (IPF) and the total cost of the project is US$50 million. The goal of the proposed World Bank funded Sierra Leone Digital Transformation Project (SLDTP) is to increase digital inclusion and enhance adoption of selected digitalized public services. The project will allow Ministry of Information and Communications and their respective Agencies to achieve and expand outcomes in three key areas: (i) expand access to broadband internet; (ii) enhance digital skills; and (iii) improve government capacity to deliver public services digitally. The overall project is to expand access to broadband internet, increase digital skills and improve government capacity to deliver public services digitally.

Based on the project description, intervention with potential resettlement risks and impacts are associated with proposed activities resulting from the provision of Last-mile Connectivity Access for Public Institutions under subcomponent 1.2 to expand high-speed broadband connectivity for selected priority public institutions at the central and local levels in Freetown and secondary cities that currently do not have broadband access. The approach is to incentivize private sector network providers through competitive contracts to guarantee long-term supply agreements with GoSL. These investments may include laying fibre cables, replacement of microwave links, etc. Potential risks and impacts are also associated with civil works under subcomponent 3.2 on Government Service Delivery Infrastructure and Networks, which includes establishing some Digital Access Points (DAPs) on a pilot basis such as post offices, digital learning hubs, internet cafes, etc. The project may include the construction of access points in four Provincial capitals and Freetown. The location of these centres is yet to be determined. Therefore, the MIC has prepared this Resettlement Policy Framework which sets out the framework under which the project will assess, plan and mitigate potential social risks and impacts of project activities as required by the ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement and relevant Sierra Leone's laws and regulations when activities' locations are identified. Adhering to this, RPF will provide the mandatory basis for developing site specific resettlement instruments: Resettlement Action Plan (RAP), Abbreviated Resettlement Action Plan (ARAP) or Livelihood Restoration Plan (LRP) as appropriate for sub-projects that lead to resettlement during project implementation and the implementation of the RPF will be included in the ESCP to be prepared.

1.2 Project Components and Descriptions

Project Development Objective Level Indicators

To expand access to broadband internet, enhance digital skills and improve government capacity to deliver public services digitally. **a) PDO Level Indicator1: Expand Access to Broadband Internet**

- People provided with new or enhanced access to broadband internet, of which rural and of which female (number);

b) PDO Level Indicator 2: Increase Digital Skills

- Youth with certified foundational to advanced digital skills (number), of which female (percentage), of which are persons with disabilities (PWDs) (percentage)

c) PDO Level Indicator 3: Improve government capacity to deliver public services digitally

- Government Ministries, Departments and Agencies (MDAs) benefitting from improved government infrastructure and networks (number);
- MDAs utilizing shared services operationalized by the project (number)

Project Components

The Project is designed around four integrated and mutually reinforcing components. The project has 4 components: (1) expanding digital access and increasing resilience of the digital environment; (2) digital skills development and innovation; (3) laying key foundations for digital government services and systems; and (4) program management and implementation support; with fifth component dedicated to contingent response to future emergencies (*Contingent Emergency Response Component, CERC*) aimed at mobilizing unallocated funds from the project to rapidly respond to emergency situations that has caused or is likely to imminently cause a major adverse economic and/or social impact. Both the project design and implementation plan have accounted for COVID-19's impact on the economy.

The following indicates the project components and allocated budgets:

Table 1-1: Summary of Project Components and Proposed Budget Allocation

Components	USD$M
Component 1. Expanding Digital Access, and Increasing Resilience of the Digital Environment	**21.3**
Subcomponent 1.1. Broadband Market Policy and Regulation	3.8
Subcomponent 1.2. Last-mile Connectivity Access for Public Institutions	9.2
Subcomponent 1.3. Inclusive Access for Underserved and Marginalized Communities	3.8
Subcomponent 1.4. Increasing Resilience of Digital Environment	4.5
Component 2. Digital Skills Development and Innovation	**5.3**
Subcomponent 2.1. Digital Skills Training	4.0
Subcomponent 2.2. Drone for Innovation	1.3
Component 3. Laying Key Foundations for Digital Government Services and Systems	**19.8**
Subcomponent 3.1. Enabling Environment for Digital Government	3.6
Subcomponent 3.2. Government Networks and Service Delivery Infrastructure	10.1
Subcomponent 3.3. Demonstration of Digital Services and Systems	6.1
Component 4. Project Management and Implementation Support	**3.6**
Component 5. Contingent Emergency Response Component (CERC)	**0.0**
TOTAL	**50.0**

Source: WB Project Appraisal Document (PAD)

1.2.1.1 Component 1: Expanding Digital Access, and Increasing Resilience of the Digital Environment (US$21.6 million)

This component aims to improve broadband market efficiencies and competition, expand access to broadband internet, and foster inclusive digital connectivity by addressing existing digital divides in Sierra Leone. Sierra Leone continues to experience challenges in strategic parts of the broadband value chain, from the first mile where the internet enters the country to the last mile where it reaches end users. A mix of financing and technical assistance is expected to strengthen regulatory capacity and instruments to increase market competition, attract private sector investment, lower internet prices, and address some key connectivity gaps in Sierra Leone.

Subcomponent 1.1. Broadband Market Policy and Regulation (US$3.8 million)

This subcomponent will strengthen upstream policy and regulatory environment in the broadband value chain in line with a Maximizing Finance for Development (MFD) approach.

International Connectivity. The project will support the government in developing a strategic approach to addressing the potential risk of having a single submarine cable-landing station, as well as to better leverage the existing international gateway for improved efficiency of the broadband market in Sierra Leone. TA will be provided to support the sector regulator in (i) developing a business case and policy instruments to facilitate increased network redundancy; (ii)

providing measures to address the climate vulnerabilities of the submarine landing cable with the aim of increasing the overall climate resilience of digital infrastructure; and (iii) supporting the operationalization of a Sierra Leone Internet Exchange Point (SLIX), including an assessment of internet traffic, identification of a business model, and development of operational guidelines. In order to establish a sustainable IXP after several unsuccessful past attempts, it is agreed that this activity will take a joint industry approach with private sector operators and aim to nurture trust between the government and such operators. Based on the findings of the feasibility study, the project will finance the purchase of equipment for SLIX in collaboration with the private sector.

Broadband Market. This activity will support review and reforms of policy and legal frameworks, such as infrastructure sharing policy, to create an enabling environment for improved competition and economies-of-scale infrastructure deployment that will lead to affordable access to broadband services. Also, this subcomponent will provide TA to the government to conduct an institutional gap assessment of NCA, the new regulatory authority which will emerge from the government's institutional reform. The project will provide capacity development support to NCA based on the findings of the gap assessment. In the meantime, the subcomponent will support the existing sector regulator's efforts to address challenges related to competition and the high price of telecommunication services through the following activities: (i) TA to draft SMP legislation; clear interconnection regulations; and tariff/cost studies to ensure fair pricing to boost market competition and increase the affordability of broadband services; and (ii) the purchase of equipment and development of regulatory capacity for efficient spectrum and network monitoring and management.

Subcomponent 1.2. Last-mile Connectivity Access for Public Institutions (US$9.2 million)

This subcomponent will provide last-mile connectivity access to the selected public institutions at the central and local levels in Freetown and secondary cities that currently do not have broadband access. Access to reliable broadband internet in priority government offices and public institutions is a critical stepping-stone to improving coordination and management among MDAs. The connectivity support will enhance wider adoption of public financial management systems and platforms, as well as improved government-wide communication and response in national emergencies. The approach being applied for last-mile connectivity under the project is demand aggregation and pre-purchase of capacity for the government through "Indefeasible Rights of Use" (IRU) for 3-5 years.[1] This approach ensures value for money, through competitively tendered contracts with the private sector that guarantee medium- to long-term supply agreements with the government, which is enabling MFD. The specific locations and target number of institutions will be determined based on the findings of the Public-Private Infrastructure Advisory Facility (PPIAF)-funded comprehensive mapping exercise. The PPIAF study will first assess the status of supply and demand of the existing and planned investments in digital infrastructure by both the private and public sectors, follow with a technical feasibility study to validate configuration of selected locations. The list of public institutions will also reflect the

[1] Any operations and maintenance costs that go beyond the closing date of the Project as well as additional bandwidth purchase after the closing date would fall under the responsibility of the GoSL.

priority sites identified in close collaboration with various MDAs, as well as other ongoing WB-funded projects to maximize synergies and development impacts.

Subcomponent 1.3. Inclusive Access for Underserved and Marginalized Communities (US$3.8 million)

This subcomponent will address the access gap in rural and remote areas, and will support digital access inclusion, especially for women and PWDs. While the project primarily focuses on improving access to broadband connectivity in urban and peri-urban areas, where access to electricity is generally available, this subcomponent will support the government's innovative approaches, elaborated below, to promoting inclusive access to broadband for underserved and marginalized communities.

Rural Connectivity Access. Key activities to support the government in developing an approach for expanding access to broadband internet in selected rural areas that the private sector is unlikely to cover for reasons of non-profitability will include: (i) provisioning of financing of least-cost subsidy reverse auctions ("Subsidy Payments") to eligible private sector providers ("Service Providers") for deployment of shared infrastructure and mobile broadband services (3G/4G) in selected rural and remote areas ("Rural Mobile Broadband Program"); (ii) partnership with the private sector, NATCOM, UADF, and academia to pilot and scale-up innovative technologies, such as satellite, and business models for rural broadband deployment. The objective of these pilots is to develop a proof of concept for an MFD approach that could inform subsequent possible scaling up to narrow the urban-rural network coverage gap.

Assistive Technology (AT) Digital Equipment. The project will also finance the purchase of AT digital equipment that can enable access to digital technologies and broadband internet for selected organizations for persons with disabilities (OPDs).

Subcomponent 1.4. Increasing Resilience of Digital Environment (US$4.5 million)

This Subcomponent aims to increase the overall resilience of digital environment by enhancing cybersecurity and climate resilience, and effectively managing electronic waste (e-waste).

Cyber Resilience. Addressing growing and evolving cyber risks and threats are key to ensuring a safe, secure, and cyber-resilient digital transformation in Sierra Leone. The activities elaborated below are designed based on the cyber-threat landscape in Sierra Leone and the identified objectives and critical paths outlined in the government's National Cybersecurity Strategy 2021-25.

Critical Information Infrastructure Protection (CIIP). The project will support the operationalization of CIIP through the following activities: (i) TA to identify sectors and systems to be considered as the critical information infrastructure (CII) by establishing a set of defining criteria, and the development of a nationwide CIIP Plan Directive, which will define the criteria for assigning and designating CIIs and will set out the processes, requirements, and specific standards for CII sectors/systems to consider when devising sector-specific CIIP plans; (ii) a review of the legal and regulatory frameworks necessary for implementing the CIIP Plan; and (iii) the development of sector/system-specific CIIP plans for the priority sectors (for example,

financial services, government, telecommunications, energy, and/or aviation). Once the CII is defined and identified under the TA, the project will finance the development of risk registries and standard operating procedures (SOPs) for the selected priority CII.

National Cybersecurity Coordination Center (NCCC) and National Computer Incident Response Team (N-CIRT). The project will also support the operationalization of the NCCC, which will be housed the Sierra Leone N-CIRT. Support will include the purchase and installation of key operational infrastructure, such as a threat intelligence monitoring and management system; an incident management platform; a contact center platform; an information-sharing platform; and other software licenses for NCCC that will be financed by the project. For the N-CIRT, the purchase of necessary hardware equipment and software licenses will be supported for the project duration, and the project will seek sustainability of the N-CIRT operation beyond the project cycle. For sustainable operationalization of NCCC and N-CIRT, the project will support the development of critical paths and a road map. This component will also finance training and capacity-building activities, particularly for N-CIRT and civil servants working in the relevant domains of cybersecurity across the government.

Cybersecurity Skills and Online Safety Awareness. The project will support developing Sierra Leone's cyber expertise and skills capacity and enhancing the country's day-to-day cybersecurity and online safety awareness and behavior. Key activities include:

i. ***Upstream TA to support the development of National Strategy and Action Plan on Cybersecurity Skills and Cyber Awareness.*** The strategy will be an anchoring document in which to outline the government's vision for nurturing cybersecurity skills development and fostering a cyber-safe culture in order to enable a resilient environment for digital transformation. The Cybersecurity Skills section of the strategy will lay out the government's vision for creating a vibrant cybersecurity skills development and training ecosystem that can be woven into both informal training opportunities and formal education curricula. The Cyber Awareness section of the Strategy and the Action Plan will lay out the government's vision for increasing public cybersecurity awareness and facilitating basic "cyber hygiene" practices among individuals, businesses, and communities in Sierra Leone. Both the Strategy and the Action Plan will incorporate the principles of inclusion in order to unleash opportunities for marginalized communities, particularly women, people in remote/rural areas, and PWDs. The TA will support the implementation of selected activities from the action plan.

ii. ***Implementation of the Strategy and Action Plan.*** The project will support implementation of selected activities from the action plan, such as a launch of public cyber awareness campaign for the population of Freetown and other major cities in Sierra Leone. The campaign will increase online safety, including through paying particular attention on child online protection and online sexual harassment.

Cybersecurity Maturity Model (CMM) Assessment. The first round of CMM was assessed in 2016 by the support from the United Kingdom Government with partnership of ITU. The project will support for the next round of the CMM assessment to identify progress made, and propose the next action plan.

Climate Resilience. This activity will finance to enable data-driven climate adaptation measures at various stages of the climate early-warning communication value chain, focusing on early warning system (EWS) communication infrastructure deployment, early warning information generation, and last-mile information dissemination. The activity will strengthen digital communication systems across the climate information value chain underlying Emergency Operations Center (EOC). It will be housed within the National Disaster Management Agency (NDMA) to facilitate the EWS for reliable information delivery and communication with other government offices, local councils, and citizens. For the back-end communication system for EWS, the project will finance the purchase of servers, data storage, and back-up and recovery systems to operationalize the EWS to facilitate seamless data exchange with subnational, national, regional, and international partners, and to ensure secure data management practices. For climate early warning information generation, the project will finance multi-stakeholder-based capacity development workshops for government offices, Mobile Network Operators, and nongovernmental organizations (NGOs) to adopt the Common Alerting Protocol (CAP) standard. And for effective last-mile information dissemination, the project will finance the inclusion of weather information as one of the services to be available under the Government Service Platform (GSP). Weather information from the meteorological system will be interfaced with the GSP and formatted to be available as user-friendly messages sent to citizens through text messages (for example, Unstructured Supplementary Service Data (USSD)), voice-based services (such as Interactive Voice Response (IVR)), and mobile and Web-based interfaces like WhatsApp and Facebook Messenger.

E-Waste Management: In line with the government's commitment under the ITU Connect 2030 agenda to reduce the volume of e-waste by 50 percent and improve e-waste policy and legislation, dialogue for an e-waste management policy in Sierra Leone has begun, however, it is still in a draft stage in the Sierra Leone Environmental Protection Agency (EPA). The project will finance quantitative and qualitative baseline surveys to assess the footprint of e-waste in Sierra Leone and support finalization of the e-waste management policy. The policy framework will also include the development of an e-waste reduce, recycle, and reuse (3R) strategy to address the full life cycle of electronic devices and equipment, thereby building a complete circular system. After the development of the policy framework, the project will support the implementation of the policy to ensure the collection and disposal, recycle and reuse of e-waste at the community-level through the partnership with local entrepreneurs and the private sector to encourage e-waste innovation

1.2.1.2 Component 2. Digital Skills Development and Innovation (US$5.3 million)

This component aims to tackle Sierra Leone's digital literacy gap by offering digital skills training for youth aged 15 to 35 years old, enabling them to develop and use digital skills to improve their livelihoods. Given that the digital skills agenda is nascent in Sierra Leone, the design of digital literacy trainings will be based on a robust market assessment of the country's supply of and demand for digital skills, as well as an analysis of the potential for youth to access livelihood opportunities through the gig economy. Leveraging Sierra Leone's progress in fostering innovative drone use for development, the project will also include training to enhance the government's plan to expand drone ecosystem and strengthen the regulatory capacity for relevant regulatory bodies such as the National Civil Aviation Authority (NCAA) and NATCOM to improve the enabling environment for drone use in delivery of strategic services.

Subcomponent 2.1. Digital Skills Training (US$4.0 million)

Comprehensive market study to assess the supply and demand of digital skills. The project will finance TA to conduct a market study to assess available skills in the target areas; determine in-demand skills; identify bottlenecks in the digital jobs value chain; and inform the design of an appropriate demand-driven training curriculum targeting youth who are outside of the formal education system. This activity will also include a detailed assessment of the local digital ecosystem to determine the capacity of key stakeholders to deliver basic, intermediate, and advanced digital skills training to youth beneficiaries.

Feasibility assessment for the potential of the gig economy to provide youth with access to new and/or supplemental income opportunities. The project will finance TA to assess barriers affecting the digitization of traditional and non-traditional jobs, and to identify potential entry points for public sector, private sector, and community organizations to accelerate job digitization through "gig work" platforms. The study will also assess the market for on-demand service platforms that enable traditional workers and informal workers to market their services and connect directly to customers, and will also explore the potential of community-based initiatives that build digital skills and generate supplemental income. Additionally, as Sierra Leone continues its COVID-19 response and recovery, the assessment will determine the feasibility of making online jobs available through a public sector-led digital platform. Findings will inform the digital literacy training scheme and innovation activities linking youth with employment opportunities.

Digital Literacy Training Scheme targeting youth outside of the formal education system, with a focus on young women and PWDs. The project will finance training schemes that combine face-to-face and remote learning to provide basic, intermediate, and advanced-level training to youth beneficiaries. The curriculum will be informed by the Digital Skills Market Study and the Gig Economy Feasibility Assessment described above, and will also emphasize the development of complementary socioemotional and professional skills. As young women face several barriers to access digital skills training, including restrictive gender norms, mobility and time restrictions, and less disposable income, the training scheme will incorporate strategies for maximizing their recruitment, retention, and livelihood outcomes. Local trainers will be recruited to participate in a Train-the-Trainers program, helping to ensure that the training content is relevant and contextualized. The project will collaborate with global private-sector companies to finance IT equipment, software applications, and ATs at training locations, and provide certification of skill attainment. Following a "funnel approach," the training scheme will include a digital jobs pilot that will connect beneficiaries with intermediate- and advanced-level skills with employment and mentorship opportunities.

Innovation Series consisting of events for youth beneficiaries—including young women and youth with disabilities—to leverage digital skills to address development challenges in their communities. This program will support the growth of the digital ecosystem by financing a series of workshops, boot camps, "hackathons," and other events in partnership with local innovation hubs. These events may leverage open data generated from government digitization activities under this operation. The Innovation Series will partner with women's groups, disability organizations, and youth organizations to maximize recruitment of young women and PWDs. Private sector partners will co-sponsor events, scale solutions, and provide employment opportunities to beneficiaries.

Subcomponent 2.2. Digital Innovation Flagship: Drones for Development (US$1.3 million)

The project will advance Sierra Leone's innovative ecosystem and strengthen the country's position as an innovative hub in West Africa by developing drone ecosystem as an innovation flagship initiative. The key activities include: (i) Review and finalization of the draft Drone Regulation currently being developed by NCAA, which will set the regulatory foundation of safe drone usage in Sierra Leone; (ii) development of the National Drone Policy and Strategy to set the strategic vision for maximizing the potential of drone applications in key sectors; (iii) drone use case development in prioritized sectors and demonstration of at least three use cases (two use cases for climate risks, such as cadastral mapping and agricultural crop monitoring), including stakeholder and community engagement to sensitize the use of drones and stimulate youth; grow Sierra Leone's digital innovation capacity; and develop private sector links to facilitate the local drone ecosystem development; and (iv) training and capacity building for drone operation in the identified use cases for drone practitioners and stakeholders, ensuring the recruitment and participation of women entrepreneurs.

1.2.1.3 Component 3: Laying Key Foundations for Digital Government Services (US$19.8 million)

This Component aims to build the core infrastructure and institutional capacity to strengthen digital public service delivery, build prioritized services and systems, and enhance the Government's operational efficiency.

Subcomponent 3.1. Enabling Environment for Digital Government (US$3.6 million)

This subcomponent aims to establish the enabling policy, legal and regulatory, institutional, and technical environment in which the building blocks of digital government will be implemented at scale without duplication or inefficiencies across various MDAs.

Policy, legal and regulatory frameworks for digital government. The activity will review, implement, and modernize policy, legal and regulatory frameworks to support and accelerate the digital government agenda. Currently, the Data Protection and Privacy legislation completed nationwide validation processes and is pending approval at the Cabinet, and the new Electronic Data Act is under Parliamentary review. The project will finance the review of these legislations to ensure that they are aligned with international best practices.

Technical frameworks for digital government. The project will lay the technical frameworks necessary for shared government systems and services. The activity will develop and implement the Digital Service Standards to guide the ideation, design, implementation, and operation of citizen-centric services, which will contain best practice principles, instruction guides, and templates to aid the public sector in delivering quality services with consistency. The Standards, once developed, will be applied to the e-services to be developed and demonstrated under the subcomponent 3.3. The activity will further support the implementation of enterprise architecture (EA) and government interoperability framework (GIF), which are currently being developed by the government in partnership with UN Foundation's Digital Impact Alliance (DIAL), to at least ten MDAs in order to enable efficient and secure intragovernmental data exchange. Prior to the implementation, the activity will provide TA to develop transition architecture and governance

mechanisms for implementation of the EA to assess the existing EA efforts for alignment with international frameworks, and to describe and facilitate the desired state and roll-out of the EA and GIF.

Organizational Change Management. The activity will provide TA and capacity building to strengthen organizational change management for effective digital transformation in public service delivery, targeting political leaders and senior civil servants as well as public sector IT professionals and civil servants. The activities will include conducting a change management assessment to identify challenges faced by political leaders and senior civil servants; developing an action plan to mitigate the identified challenges in adopting and using these project investments; and developing a communications plan to outline key goals, target stakeholders, and convey key messages, outreach approaches, and timeline details. This activity's training will focus on developing skills for digital leadership, technologies, project planning and operational management; and will incorporate lessons on the Digital Service Standards for officials involved in public service planning, design, development, and deployment.

Open Data. The project will scale up and strengthen Sierra Leone's Open Data initiatives and Data Analytics in line with the recommendations of World Development Report 2021: Data for Better Lives. The project will finance: (i) TA for the development of streamlined procedures for information disclosure and practices for regularly updating the disclosed data (quarterly, semi-annually); (ii) pilot implementation of the data disclosure procedures and practices across selected MDAs; (iii) capacity development to select MDAs for increasing data analytics, with a particular focus on strengthening data-driven climate resilience measures for disaster risk management and early warning practices; and (iv) partnership development with entrepreneurs and technology hubs to incentivize the use of open government data in the form of hackathons or challenge funds in tackling climate risks in Sierra Leone in connection with the subcomponent 2.1.

Subcomponent 3.2. Government Service Delivery Infrastructure and Networks (US$10.

This subcomponent aims to strengthen key infrastructure and network for digital government service delivery. It will address and implement prioritized government data hosting and storage infrastructure and network upgrades, assess current gaps in establishing a national cloud-enabled data center, establish a common notification and communications platform to serve the needs of MDAs to notify and communicate with citizens, and pilot DAPs for citizens to bridge the digital divides. Key activities will include:

Digital government data hosting, service delivery infrastructure, and network upgrades. The project will finance a TA to assess the data and application hosting needs for digital services and systems implemented under subcomponent 3.3. Also, the project will provide TA to conduct a comprehensive assessment of the current government networks (Government Wide Area Network (GWAN) and Government Local Area Network (GLAN)), and to develop a transition strategy with a phased implementation plan to guide MIC toward an optimal network design that is aligned with international network standards. The project will subsequently finance part of phase 1 of the implementation plan with an estimated network connectivity for 50 prioritized MDAs.

Shared data hosting solution/government cloud. The project will finance a TA to conduct a gap assessment of government data hosting and storage infrastructure; and to develop

recommendations on the technical architecture and operational design needed to address existing core infrastructure gaps, including the development of blueprints to guide government-wide implementation for shared government data infrastructure with disaster recovery capabilities. The TA shall provide recommendations on policies, processes, and standards to support the set-up and operationalization of shared government data hosting and storage infrastructure, such as a cloud-enabled data center which serves to provision data and application hosting to MDAs.

Government notification and communications platform. The project will finance a TA to support the rationalization and synthesis of the two existing platforms. One of these platforms is the GSP, implemented by the Directorate of Science, Technology, and Innovation (DSTI), which presently offers communication channels inclusive of USSD and short message service (SMS); the other is the Government Integrated Messaging System (GIMS), which offers email, short code messaging, and online chat. The objective is to provide a unified and simplified notification and communications platform to serve the needs of MDAs in notifying citizens of public service transaction statuses; soliciting feedback from citizens; and broadcasting messages (for example, emergency alerts). This activity will contribute to a significant enhancement of Citizen Engagement (CE) channels in Sierra Leone and will facilitate more frequent and timely communication between citizens and the government.

Digital Access Points (DAPs). The project will pilot establishment of DAPs for citizens by leveraging existing citizen-facing outlets such as post offices, digital learning hubs, internet cafes, etc. in order to provide citizens with access to the internet and to basic government and private sector services. The DAPs will be distributed across the central business district, the west end, and the east end of the capital. The project will first finance a TA to conduct a feasibility study to identify potential sites to serve as DAPs, and to assess the availability of internet connectivity and the viability of providing key Government-to-Citizen (G2B)/ Government-to-Business (G2C) public services with a list of potential e-services to be provided. The project will subsequently finance the pilot to deploy selected DAPs based on the findings of the feasibility study, which will consider the demand for services as well as demographic information to maximize accessibility for women and PWDs.

Subcomponent 3.3. Demonstration of Digital Services and Systems (US$6.1 million)

This subcomponent will support the implementation of selected prioritized digital services for which there is a high demand. It will finance at least three high-impact citizen/business service developments based on the public service landscape review. It will also support digitalization of the three distinct branches of the Government by developing the Electronic Cabinet System (e-Cabinet) to support evidenced-based decision making; developing the Electronic Parliament System (e-Parliament) to strengthen the bond between parliamentarians and their constituents; and providing a TA to establish a blueprint for an electronic justice system (e-Justice) in Sierra Leone.

Government-to-Citizen (G2C) and Government-to-Business (G2B). The project will finance a TA to conduct a public service landscape review to prioritize high-demand, high-impact digital services suitable for implementation. It will subsequently finance the development of at least three public services (such as applications for birth certificates, death certificates, and driver's licenses), applying the Digital Service Standards highlighted under subcomponent 3.1 to align with good practices on design thinking principles. The services will be implemented through a prototyping

approach in order to facilitate iterative feedback by citizens and public sector stakeholders, to ensure that their needs and expectations are being adequately addressed.

Government-to-Government (G2G) systems. The project will finance the digitization of processes and documents essential for the Parliament to strengthen the bonds between parliamentarians and their constituents, and for the Cabinet to realize an evidenced-based decision-making platform. The activity will support the development of an electronic document and record management system to improve the clarity and accuracy of Cabinet records in line with the ongoing e-Cabinet initiatives by the government. It will also support the development of the e-Parliament system to enable communication and information exchange between parliamentarians and with their constituents. This system will integrate relevant stakeholders and processes into an orchestrated platform. Lastly, the activity will finance a TA to establish a blueprint of an e-Justice system to accelerate digitization and enhance the efficiency of judicial services in Sierra Leone. Given the complexity of this initiative and the government's limited budget, the actual implementation of e-Justice is not anticipated under this project.

1.2.1.4 Component 4: Project Management and Implementation Support (US$3.6 million)

This component will finance the Republic of Sierra Leone's project management and coordination capacity, including procurement, financial management (FM), monitoring and evaluation (M&E), environmental and social (E&S) safeguards management, project communication, and citizen engagement. IT will also cover the cost of modest office equipment, independent audits, and learning/training for key beneficiaries (for example., the Project Coordination Unit (PCU) staff and the Technical Committee) to support the public sector's ability to build and retain skills for implementing a whole-of-government digital transformation. Special attention will be devoted to promoting equal participation of women in all decision-making bodies under the project and contributing to tackling barriers in recruitment, retention, and promotion.

Citizen Engagement (CE) will be financed under this subcomponent and include: (i) the development and implementation of a comprehensive grievance redress mechanism (GRM) to collect and respond to issues encountered by beneficiaries, system users, other system stakeholders, as well as the general population, including links between the GRM and M&E systems in order to improve project monitoring data; (ii) the development of a comprehensive CE strategy and national consultation mechanism to ensure that all relevant stakeholders, including beneficiaries and marginalized groups, are consulted about the project design and implementation on at least an annual basis and the feedback from those consultations is incorporated into the implementation plan and design of project-financed systems; (iii) qualitative user research to identify barriers to accessing and successfully using project-financed systems and services, particularly barriers faced by marginalized groups and underserved populations, and inform the design and implementation of the activities; and (iv) surveying the usage and satisfaction of users of project-financed systems and services.

1.2.1.5 Component 5: Contingent Emergency Response Component (CERC) (US$0 million)

In the context of the COVID-19 crisis, a CERC has been added to the project structure to provide the support the Government for swiftly responding to an eligible crisis, including climate or natural disasters and public health emergencies. Including CERC at the preparation stage, albeit with zero

funding, provides for flexibility for an agile response to an imminent or actual emergency (such as COVID-19) through quick disbursement of uncommitted balances from other components. The crisis response expenditures could cover, for instance, the facilitation of emergency payments to vulnerable groups of the population using mobile money or ensuring continuity of core government functions, when civil servants are required to continue home-based work. The CERC is not expected to finance civil engineering works that can induce risks and/or negative environmental and social impacts.

1.3 Description of Project Components for which Land Acquisition and Resettlement Are Required

The proposed SL DTP activities under subcomponent 1.2, 1.3 and 3.2, respectively, may involve land acquisition and/or economic displacement. The exact locations of subproject activities are not known at this stage of project preparation. Therefore, in compliance with the laws of Sierra Leone and World Bank ESS 1 and ESS 5, MIC has prepared this RPF to clarify resettlement principles, organizational arrangements, and design criteria to be applied to subprojects or project components to be prepared during project implementation when the project locations/corridors are identified.

Table 1-2: Activities under subcomponent 1.2. 1.3 and 3.2

Activities	Description
Components 1: Expanding Digital Access, and Increasing Resilience of the Digital Environment Subcomponent 1.2 Last mile connectivity access of public institutions Subcomponent 1.3 Rural connectivity access	The project will involve construction of transmission sites and installation of fibre optic cable. However, it must be noted that the transmission sites will be setup in government owned facilities. Aerial cables will be installed within the right of way thus land uptake isn't anticipated only minimal temporal disruption may be experienced.
Component 3: Laying Key Foundations for Digital Government Services and Systems Subcomponent 3.2. establishment of digital access point Installation of fibre optic cables Installation of transmission sites Displacement of road side market vendors	

1.4 Purpose/Rationale for RPF

The components outlined above are the most likely intervention to result in land acquisition and resettlement. As specific sub-projects and locations are not currently known, it is not possible to determine the exact nature or extent of any physical and /or economic displacement that may occur. Hence, a Resettlement Policy Framework (RPF) is prepared at this stage. ESS 5 stipulates that an RPF needs to be prepared if the extent and location of resettlement cannot be known during preparation. This RPF therefore gives a framework of the policy, principles, institutional arrangements and procedures that the Project will follow to prepare Resettlement Action Plans to mitigate risks related to land acquisition, and involuntary resettlement likely to be caused by the project activities. The RPF clarifies the process for identifying people who may be affected and considers the requirements of the World Bank's ESS 5 and the Constitution of Sierra Leone (1991) and other related national laws and regulations of Sierra Leone to mitigate Involuntary Resettlement risk.

The key policy principles governing resettlement preparation and implementation are:

- Avoid or minimize or mitigate involuntary resettlement where feasible, exploring all viable alternatives of project designs.
- Help resettled people improve their former living standards, their ability to generate revenue or at least to cater for them.
- Aid affected people regardless of the legality or land tenure.
- Conduct consultations using participatory approaches with project affected persons and stakeholders.
- Ensure project affected persons have access to a functioning grievance redress mechanism.

1.5 Method for Preparing the RPF

The following approach was adopted in the preparation of the RPF:

Desktop Review: This consisted of the review of relevant documentation available including the SL DTP PAD, relevant national legislations, RPF of various Bank funded projects as well as World Bank's ESS 5. These reviews provided information on the national legislations that regulate land related issues in the country, with reference to compulsory land acquisition and highlighted the Bank ESS 5.

Field visits and Consultations with Potential PAPs: The visits and the consultations were done between 20th April and 6th May 2022 with key stakeholders such as The Ministry of Information and Communications (MIC); Ministry of Lands, Housing and Country Planning; Ministry of Finance; Environment Protection Agency (EPA); National Telecommunication Commission (NATCOM), Universal Access Development Fund (UADF); Independent Media Commission (IMC), National Commission for Persons with Disability; Dorothy Springer Trust; Telecoms (Orange, Africell, QCell, Sierratel); Private Sector, Traditional Authorities, Communities and Students (schools and universities). This provided the opportunity to:

- Discuss with the local communities about the project and its requirements for land and any environmental and social issues the potential beneficiaries may wish to raise
- Identify specific interests and discuss potential roles and responsibilities of stakeholders that would facilitate participation, ownership and sustainability of the project

The consultations took the form of one-one-interviews, focus group discussion, and telephone interviews with representatives of relevant government ministries, department and agencies, and potential project beneficiaries at the community level. The list of agencies and representatives that participated in the consultations is presented in Annex B.

2 DESCRIPTION OF THE PROCESS FOR PREPARING AND APPROVING RESETTLEMENT PLANS

2.1 Introduction

The SL-DTP might require a Resettlement Plan since it will finance productive investments that may result in minimal temporary livelihood disruption. As the specific sites for the implementation of subprojects are yet to be identified, a RPF has been prepared that will guide the preparation of site-specific RAPs during implementation. However, during implementation of the project, in a process defined below, the identification of these areas will be made. This RPF provides a framework for resettlement associated with the project. Each subproject will need to go through a process to identify the level of resettlement required, and if so, the development of a plan for resettlement. At this stage, the World Bank ESS 5 may call for the preparation of individual RAPs consistent with this RPF.

To address the impacts under this policy, resettlement and compensation plans must include measures to ensure that impacted persons are:

- informed about their options and rights pertaining to the project, resettlement, and compensation.
- consulted on, offered choices among, and provided with technically and economically feasible resettlement and compensation alternatives.
- and provided with prompt and effective compensation at full replacement value for losses of assets and access, attributable to the project.

According to ESS 5, for all subprojects included in a project, the Bank requires that a satisfactory Resettlement Action Plan (RAP) that is consistent with the RPF be submitted to the Bank for approval. However, ESS 5 also suggests that: "For certain projects, subproject abbreviated RAPs maybe approved by the project implementing agency or a responsible government agency or financial intermediary without prior Bank review, if that agency has demonstrated adequate institutional capacity to review resettlement plans and ensure their consistency with this policy. In all cases, implementation of the resettlement plans is subject to ex post review by the Bank"

MIC will prepare RAPs that will be reviewed and approved for disclosure by the World Bank.

2.2 Resettlement process

This RPF will culminate in the preparation of Plans as may be required in instances of acquisition of land outside the existing rights of ways and land already in the custody of Government institutions, where resettlement is required, the following steps will be undertaken:

Step1: Consultation and participatory approaches. Preliminary assessment shall be carried out on the basis of the objectives of the project through a participatory approach. The consultations will commence during the planning stage when the technical designs are being developed, and at the land selection/screening stage. The process therefore seeks the involvement of PAPs throughout the census for identifying eligible PAPs and throughout the RAP preparation process.

Step 2: Census of affected persons. In this step, all owners of assets that are likely to be affected by the project are enumerated; their properties are assessed and their socio-economic status is documented.

Step 3: Disclosure and notification. MIC will approach the impacted communities through local government with the view to arriving at a consensus on possible sites for the type of facility to be adopted. All eligible PAPs are informed about the RAP process. A cut-off date is established as part of determining PAP eligibility. In special cases where there are no clearly identifiable owners or users of the land or asset, MIC will notify the respective local authorities and leaders.

Step 4: Documentation and verification of land and other assets. The government authorities at both national and local levels, community leaders, and representatives from MIC will arrange meetings with PAPs to discuss the compensation, valuation and disclosure process. For each individual or household affected by the project, the RAP preparation team will complete a Compensation Report containing necessary personal information on the PAPs and their household members; their total land holdings; inventory of assets affected; and demographic and socio-economic baseline studies for monitoring of impacts. This information will be documented in a Report, and ideally should be "witnessed" by an independent or locally acceptable body (e.g., Resettlement Committee). The Reports will be regularly updated and monitored.

Step 5: Individual Compensation and valuation. All types of compensation will be clearly explained to the individuals and households involved. These refer especially to the basis for valuing the land and other assets. Once such valuation is established, MIC will produce a Contract or Agreement that lists all properties and assets being acquired by the project and the types of compensation adopted. The compensation options include in-kind (e.g., replacement housing) and cash compensation enumerated through an agreed compensation matrix. All compensation should occur in the presence of the affected persons and the community local leaders. Compensation agreement forms must be signed by the affected persons, MIC and an appointed community local leader.

Step 6: Community payments. This will apply where the proposed project affected asset belongs to a community. The compensation for the asset will be paid to the community through its representation or delegates.

Step 7: Grievance mechanism. The project RAP team will establish a community grievance mechanism. This may be set up through Local Authorities, including a Resettlement or Land Committee and through community leaders. All PAPs will be informed about how to register grievances or complaints, including specific concerns about compensation and relocation. The PAPs should also be informed about the dispute resolution process, specifically about how the disputes will be resolved in an impartial and timely manner. The RAP Team will produce a Report containing a summary of all grievances. If needed, the dispute resolution process should include Rwandan Courts of Law, but traditional institutions and lower levels close to communities can be an effective first step in both receiving and resolving grievances.

Step 8: Defining Entitlements and Preparing an Entitlement Matrix. The basis of what is to be paid as compensation will be determined by identifying the most appropriate entitlement for each

loss. Based on the entitlements, options for resettlement would be selected in accordance with Bank Policy ESS 5 and the merits of the option. The RAP planner will prepare an entitlement matrix with respect to both temporary and permanent displacement. This matrix will set the measure for the payment for all losses or impacts. It will also list the type of loss, criteria for eligibility and define entitlements.

2.3 Disclosure and Approval of Resettlement Action Plans

The following steps should be followed after full/abbreviated RAP preparation:

1. The Draft RAP shall be subject to discussion with PAPs who will receive a copy of the RAP a week before the discussion. Public consultations shall be attended by PAPs, district MIC, Local Councils and other representatives, to discuss, and conclude, means of compensation and the proposed mitigation and compensation measures;
2. After the discussion, comments and proposals shall be reflected in the RAP;
3. The RAP shall include a section of the consultation process with the matrix of comments and proposals for the inclusion and implementation thereof;
4. The Social and Gender Specialist shall submit the RAP to the Project Coordinator for approval;
5. After inclusion of the comments received as a result of the disclosure of the RAP and after approval thereof by the Project Coordinator, the RAP shall be officially sent to the WB for review and confirmation on the compliance with ESS5 and other applicable policies/procedures, and provide no objection to the draft RAP;
6. Once the World Bank confirms the acceptability of the quality of each RAP, it shall be disclosed on the WB website, published as a final RAP on the MIC/MoF website and re-shared with all stakeholders. Private information about PAPs shall not be made publicly available.

No changes shall be made to the compensation entitlement matrix, eligibility criteria, compensation rates, or provisions for assistance without the prior World Bank's consent.

2.4 RAP Implementation

Implementation of the sub-project's RAP will be considered completed when the adverse impacts of resettlement have been addressed in a manner that is consistent with the relevant plan as well as the objectives of ESS5. For all projects with significant involuntary impacts, the Borrower will commission an external completion audit of the plan when all mitigation measures have been substantially completed. The completion audit will be undertaken by competent resettlement professionals, will assess whether livelihoods and living standards have been improved or at least restored and, as necessary, will propose corrective actions to meet objectives not yet achieved.

3 ESTIMATED DISPLACEMENT IMPACTS AND ESTIMATED NUMBERS AND CATEGORIES OF DISPLACED PERSONS

3.1 Estimated displacement impacts

At this moment, it is not possible to estimate the extent of the displacement impacts, since sub-projects are not defined.

3.2 Estimate of potentially displaced population

The project may include the construction of data centres and access points in the four provincial capitals and Freetown. The location of these centres is yet to be determined, but they are likely to be constructed on government land. Notwithstanding, at this point there would be the potential for the resettlement and/or economic displacement of informal users. However, the uncertainty of locations makes it difficult to provide an estimate of the potentially displaced population. If the construction activities were to take place, an exhaustive list of displaced persons will be provided in the associated RAP. Additionally, it should be noted that activities implemented by the regional PCU do not include any potential physical works, hence will not be required to undertake any resettlement actions.

3.3 Categories of displaced or project affected persons

These are entities whose assets may be lost, or access to natural and/or economic resources as a result of activities related to sub-project(s). Project affected persons (PAPs) irrespective of their status (whether they have formal title, legal rights, non-legal right) are eligible for some kind of assistance if they occupied a given land parcel before the cut-off date. According to World Bank ESS 5, owners of businesses or persons employed are also eligible for compensation. The likely displaced persons can be categorized into four groups, namely:

(i) *Affected individual:* An individual who suffers loss of assets or investments, land, and property and/or access to natural and/or economic resources as a result of the sub-project activities and to whom compensation is due. For example, an affected individual is a person who farms a land, or who has built a structure on land that is now required by a sub project for purposes other than farming or residence by the initial individuals.

(ii) *Affected households:* A household will be affected if one or more of its members are directly affected by the project activities. This will be either in the form of loss of property or use of land loss of other assets, or access to services or socioeconomic resources. This provides for:

   i. Any member of the household whether men, women, children, dependent relatives, friends and tenants;
   ii. Vulnerable individuals/groups who may be too old or ill, children, female-headed households, persons with disability, Orphans, unemployed women living alone, unemployed youth etc. households headed by women that depend on sons, brothers, and others for supports especially vulnerable. Similarly, households with elderly or terminally ill persons are eligible for additional support;
   iii. Members of households who are not residents because of cultural rules, but depend on one another for their livelihood.
   iv. Member of households who may not eat together but provide housekeeping or other activities critical to the family's maintenance, and

v. Other vulnerable people who cannot participate, due to being physically challenged or for cultural reasons; in production, consumption or co-residence.

(iii) *Community:* community is affected if project activities affect their socioeconomic and/or social-cultural relationships or cohesion. Since the fiber optic cables will be buried in ground, no permanent impact is anticipated even when trenching is done on community assets (playgrounds, school, or roadside markets) but only temporary disruptions. Road users and roadside vendors are another category of entities that would be affected under this category, particularly during trenching to lay fiber optic cables might result in minimal income loss.

(iv) *Vulnerable households:* vulnerable people are people who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status, may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits. For this project, this category will include orphans, the infirm or ill, children, elderly people, women and people with disabilities.

Special consideration should be paid to these groups outlined above by identifying their needs from the census and the socio-economic studies undertaken as part of the Resettlement Action Plan process once project sites are identified and PAPs identified. In addition to that, these groups should be individually consulted and given opportunities to participate in the resettlement decision-making process, as well as project activities, including the identification of mitigation measures that are commensurate with the impacts they experience and appropriate to their circumstances. Consultation with these groups should ensure that resulting resettlement and compensation restores and/or improves their pre-project livelihood.

(v) Institutions: this category comprises schools, health centres and community centres. Compensation in this case is given to institution as a single entity rather than individual.

(vi) Utility companies whose infrastructures may be affected when laying optic cables:

- Telecommunication companies (e.g., Sierratel, orange, africell, QCell
- Water companies (e.g., Guma Valley Water Company (GVWC), Sierra Leone Water Company (SALWACO)
- Power Supply Companies (e.g., Electricity Distribution and Supply Authority (EDSA), Electricity Generation and Transmission Company (EGTC)
- Roads authorities-municipalities (e.g., Sierra Leone Roads Authority (SLRA)

4 POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

4.1 Introduction

The principles and procedures for land acquisition and resettlement in this project are drawn mainly from applicable national land acquisition laws and policies of Sierra Leone as well as the World Bank ESS 5. Below are relevant laws, policies and regulations and a gap analysis between Sierra Leone legal framework and the World Bank ESS 5.

4.2 Relevant Legal Framework

4.2.1. Constitution of Sierra Leone 1991

The Constitution recognizes Sierra Leone's dual legal system. It grants the right to the enjoyment of property but does not address the vesting or ownership of land. The Constitution upholds the fundamental rights and freedoms of the individual including the protection from expropriation without payment or adequate compensation and guarantees the protection from deprivation of property including compulsory possession by the state[2]. Furthermore, it also makes (section 21(1) c) provision for the 'prompt payment of adequate compensation, and securing to any persons having an interest in or right over the property, a right of access to the court or other impartial and independent authority for the determination of the land owner's interest or right, the legality of the taking of possession or acquisition of the property, interest or right, and the amount of any compensation to which he is entitled and for the purpose of obtaining prompt payment of that compensation'.

4.2.2. The Protectorate Land Ordinance of 1927

The Protectorate Land Ordinance of 1927 declared that all lands in the Protectorate were vested in the Tribal Authority and that, they held such lands for and on behalf of the native communities concerned. It regulated the exercise of power by the Tribal Authorities to permit the use of, and occupation of Protectorate land by non-natives, Section 4 of the Ordinance stated "No non-native shall acquire a greater interest in land in the Protectorate than a tenancy for a term of fifty years; but nothing in this section shall prevent the insertion in any lease of a clause providing for the renewal of such lease, for a second or further terms not exceeding twenty-one Years." This dichotomization of rights to land was further cemented by the Concessions Ordinance of 1937 which prevented Tribal Authorities from granting concessions of any Protectorate land for the purpose of cultivation except under the terms of the Ordinance and the earlier Protectorate Land Ordinance of 1927. Any concession is limited to 1,000 acres; and where it could be shown that it will benefit the Chiefdom, it need the Governor's consent. Leases granted by the Tribal Authority had to be for no more than 50 acres and must not last beyond 99 years unless such lease was to government or for the national good.

[2] Section 21, 1991 Constitution of Sierra Leone

4.2.3. The Provinces Land Act Cap 122 of 1960

The Provinces Land Act Cap 122 of 1960 which replaced the Provincial Land Ordinance, 1927, was established to guide processes for land acquisition and set out the conditions for the allocation of lands to 'non-natives' in the provincial areas of Sierra Leone. It reconfirms that supreme authority over land in the provinces is vested in the Tribal authorities, who hold land for and on behalf of the concerned native communities. Sec. 3 states that no land in the Protectorate shall be occupied by a non–native unless he has first obtained the consent of the Tribal Authority to his occupation of such land. Any non-native who occupies land in the protectorate without the approval of the District Commissioner is deemed as a tenant at will. Sec. 4 adds that no non-native is to acquire an interest in land in the protectorate more than a tenancy for a term of fifty years. However, the tenancy can be renewed for a second or further term of twenty-five years. The rents reserved under such leases are subject to review by the District Commissioner every seven years, from whom there is a right of appeal to the Provincial Commissioner. However, no rent shall be sanctioned by the District Commissioner by reason only of the improvements made by the tenant or his predecessors in title. By Sec. 5, the Tribal Authority can purchase any fixture or building left by the tenant and can also pay compensation to the tenant for any economic trees which have been planted by the tenant at a fair value to any incoming tenant of the land. If rural land is required for public purposes, State authorities deal directly with the Paramount chiefs. This Act distinguishes between 'native' and 'non-native' as far as access to provincial land is concerned which is generally perceived as hindrance to proper use of such land for development purposes because of the conflicting interest between policy makers and chiefdoms. It is therefore noted as one of the key issues for redress by the Cabinet sub-committee on lands headed by the chairperson of the Law Reform Commission.

4.2.4. The Concessions Act, Cap 121.

This statute was enacted in 1931 for the express purpose of regulating the rights which 'natives' could grant to 'non-natives', with the consent of the Governor by way of concession for mining or agricultural purposes. Concessions under the act could be granted for a term as long as ninety-nine years and could cover an area of one thousand acres and above. However, the procedure for the grant of a concession was very complicated and time-consuming. Not only must a special Concession Court under section 11 of the Act validate the grant, but, if the extent of the concession exceeded five thousand acres, the Governor had to give his assent subject to the approval of Parliament. Though the Act still remains in the statute books and was even amended in 1976 to exclude mining concessions from its provisions, the Act has not been invoked in recent times for the purpose of granting access to provincial land to foreign investors in agriculture. The relevance of this act to the RPF is premised on the assumption that some properties or lands that will be affected by this project may have been acquired using provisions of this Act.

4.2.5. The Survey Act, Cap 128.

This act specifies all the processes involved for the administration and survey of all lands. It is being administered and regulated by the Survey Department of the Ministry of Lands, Housing and Country Planning. The Act makes it compulsory for every conveyance deed or other instrument submitted for registration to have a survey plan annexed thereto, such plan to be

prepared by a surveyor and countersigned by the Director of Surveys and Lands in accordance with section 15 of the Survey Act as amended.

4.2.6. The General Registration of instruments Act Cap 255, Act, Cap 256 of 1960

The General Registration of instruments Act Cap 255, Act, Cap 256 of 1960 makes extensive provisions for the registration of different legal instruments. It provides the time limits within which certain legal instruments are to be registered, and whether such documents are to take effect in the Colony or the Protectorate. By Sec. 11, the Registrar-General is empowered to register any State Grant upon the production and request of the holder of such grant, and to cause to be copied and registered in a Register Book kept for that purpose. Each instrument, apart from a will, is required to have a certificate of registry as well as a plan of the land signed by the person who made it, describing the land or referring to the allotment of land as numbered or described in the instrument of conveyance from the State.

4.2.7. The Unoccupied Lands (Ascertainment of Title) Act, Cap 117 of Laws of Sierra Leone 1960

The Unoccupied Lands (Ascertainment of Title) Act, Cap 117 of Laws of Sierra Leone 1960 defines Unoccupied Lands as land where it is not proved by the person who is claiming it that beneficial use thereof for cultivation or inhabitation, or for collecting or storing water or for any industrial purposes, has been made for twelve years before the commencement of this Act. This Act empowers the Director of Surveys and Lands under the Ministry of Lands, Housing and Environment to claim any land considered to be unoccupied within the meaning of the Act as State land. For the purposes of the Act: *"all land shall be deemed to be unoccupied where it is not proved by the person claiming the same that beneficial user thereof for cultivation or habitation, or collecting or storing water, or for any industrial purpose has been made for twelve years next prior to the commencement of the Act."* If the claim is disputed the matter could end up in court and be added to the ever-increasing number of land disputes pending before the courts. Though the provisions of this Act have for long remained dormant there are signs that its provisions are now being invoked more frequently as the Government embarks on a drive to identify and recover illegally occupied State land. Since the socioeconomic circumstances and the policy imperatives that led to the enactment of this law in 1911 no longer exist there might be a need to review and amend, if necessary, not only the substantive grounds upon which the State can claim lands under this statute as State land but the procedure laid down in the Act which is bound to give rise to litigation in each case ought to be revisited.

4.2.8. The Town and Country Planning Act, Cap 81 1960

The Town and Country Planning Act, Cap 81 1960 established the Town and Country Planning Board in the Western Area. Where the Board is of the opinion that a scheme is to be made for any area, it can make representations to that effect to the Minister who may by order declare that the area specified in the representation shall be a Planning Area. The value of any building or land in such a Planning Area shall be deemed to be the value of the building or land at the date of such declaration Sec.6 (4).

4.2.9. State Lands Act No. 19 of 1960 (Amendment)

The State Lands Act No. 19 of 1960 as amended (Crowns Land Ordinance) and is applicable only to the Western Area or former Colony. It makes provision for situations where the government may want to acquire certain lands in order to undertake 'public works in the Western Area. By Sec. 3, the Minister can authorize his agents or servants to enter into any land to survey and do other acts as may be necessary with a view to appropriating such land. Where the Minister together with Parliament decides that such land is needed for Public works, the Minister is then to do a warrant to direct that such land should be acquired for the service of the State. The Non–Citizens (Interest in Lands) Act, 1966 is applicable in the Western Area only. A noncitizen is defined as any individual who is not a citizen of Sierra Leone, or any company, association or body of persons with more than half of its members of which are not Sierra Leoneans. Sec. 3 of the Act states categorically that no non-citizen shall purchase or receive in exchange or as a gift any freehold land in the Western Area. By Sec. 4, no non-citizen is to receive in exchange or as a gift, any reserved leaseholds in the Western Area without first obtaining a license from the Board. Reserved leasehold is defined as leaseholds which the unexpired term exceeds 21 years.

The Act gives Government the power to acquire and manage any land for public purposes such as:

1) For exclusive Government use or for general public use;
2) For or in connection with sanitary improvements of any kind, including reclamations;
3) For or in connection with the laying out of a new Government station of the extension or improvement of any existing Government station;
4) For obtaining control over land contiguous to any port or airport;
5) For obtaining control over land required for defence purposes
6) For obtaining control over land required for civil aviation purposes;
7) For obtaining control over land the value of which will be enhanced by the construction of any railway, road, or other public work or convenience about the undertaken or provided by the Government.

This Act is currently being reviewed as part of the national land policy so that the proposed National Land Commission will be responsible for the administration of this Act on behalf of Government.

4.2.10. The Customary Land Rights Act (Draft)

The Customary Land Rights Act Draft would provide for the protection of customary land rights, the elimination of discrimination under customary law and the management and administration of land subject to customary law and other related provisions. The implementation and enforcement of this Act will:

- Guarantee and preserve all customary land rights;
- Guarantee that access to customary land by way of transfer or transmission does not deny any citizens rights to land on the basis of their gender, ethnicity, tribe, religion, age, marital status and economic status;
- Ensure equity, transparency and accountability in the allocation and management of land rights;
- Preserve and conserve land resources for future generations;

- Ensure the full protection of use rights and right to commons without discrimination

4.2.11. The Lands Commission Act 2021

The Lands Commission Act 2021 would establish land commissions at the national and the district level to integrate the operations of public land institutions in order to secure effective and efficient land administration to provide for related matters. The overall purpose of this Act is to establish a Lands Commission with offices at the national and district levels, in order to grant rights to lands; impose restrictions; implement policies on land and rural development; advise government, local councils and traditional authorities on the policy framework for the development of particular areas; recognize and establish the content of land tenure rights as well as transform ownership rights of such lands; advise and assist in the execution of a registration Programme; and perform other functions as necessary. The Land Commission will interpret the policy, apply it, and review existing laws.

The commission would have the following departments:

- Land title registration
- Legal
- Cadastral index mapping
- Monitoring and evaluation
- Corporate communication and advocacy
- Administration

4.2.12. The Local Government Act 2004

The Local Government Act 2004 establishes the system of local government, which is based on localities (districts or metropolis), and their sub-structures. Regarding land tenure, the Act affirms provisions of the Land Laws and Customary Law, by affirming the Chiefdom Councils Act.

Localities include District Councils, Town Councils, and City or Metropolitan Councils. The councils are constituted by a Chairman, elected councillors and a number of Paramount Chiefs, and are the highest political authorities in these localities. They are vested with legislative and executive powers, to be exercised in accordance with the Act, or other enactments. Section 20 (2) (d) of the Act invests the Councils with the responsibility of "promoting the development of the locality and the welfare of the people in the locality with the resources at its disposal". Towards this, the council is empowered, among others to:

(i) promote and support productive activity and social development in the locality
(ii) initiate and maintain programmes for the development of basic infrastructure
(iii) be responsible for the development, improvement and management of human settlements and the environment in the locality
(iv) initiate draw up and execute development plans

The 2004 act included also a timetable for the devolution of functions from central government to local councils, and which stated that the Ministry of Lands, Country Planning and the Environment

will pass over land surveying by 2008 survey units within local councils, including surveying and setting up land registration units. The land use planning has just been affected by the government in 2019.

4.2.13. The 1988 Forest Act

The Act creates several categories of forest: classified forest, national protection forests, community forests, and protected forests. Section 2 of the Act provides that should the Minister wish to make any land not owned by the State into a national forest in the Provinces, a lease of not more than 99 years must be entered into and subject to renewal for another 99 years and rent for such land must be agreed with the Chiefdom Council. In the case of land in the Western Area, the Minister can purchase the freehold. Section 18 of the Forestry Act makes provisions for the constitution of Community Forests. The Chiefdom Council will be able to include a list of existing rights that will be confirmed by the agreement creating the forest and which will hand the management of such Community Forest to the Chiefdom Council (S.19) thus bringing it in line with their custodianship of all other lands in the Provinces.

A Draft Forestry Policy and Act was developed in 2011 to replace the 1988 Act and set up according to similar guiding principles as the draft Conservation and Wildlife Policy. It acknowledges the environmental role of forest areas and places emphasis on the preservation of the forest environment and establishes a set of policy objectives around forestry land management, forest-based industry and practices, ecosystem conservation, education and awareness, research and awareness, research and monitoring, and capacity building. However, the new Forestry Act has not been approved yet.

4.3 Policy Framework

1. The National Lands Policy 2015
2. The National Environmental Policy (1994) and cultural heritage issues
3. Development-Induced Resettlement Policy

4.3.1. National Land Policy, 2015

The National Land Policy addresses many of the lapses of the dual land tenure system in Sierra Leone (freehold in the Western Area and communal in the provinces). It also provides for the compulsory acquisition of land in the public interest. The principles of the land policy include among others:

- Principle of land as a common national or communal property resource held in trust for the people and which must be used in the long-term interest of the people of Sierra Leone. This principle only holds where it does not violate existing rights of private ownership;
- Compensation to be paid for lands acquired through compulsory acquisition will be fair and adequate and will be determined, among other things, through negotiations that take into consideration government investment in the area;
- No interest in or right to any land belonging to an individual or family can be disposed of without consultation with the owner or occupier of the land; and
- No interest in or right to any land belonging to an individual or family can be compulsorily acquired without payment, in reasonable time, of fair and adequate compensation

The aspiration of the land policy of 2015 is to move towards a clearer, more effective and just land tenure system that shall provide for social and public demands, stimulate responsible investment and form a basis for the nation's continued development. The policy affirms that a secure land tenure system is a critical element of consolidating the peace and recovery processes in Sierra Leone and it is fundamental to the nation's development.

Some of the main problems related to land tenure currently prevalent in Sierra Leone and which are addressed in the policy are:

- Inequitable access to land
- Shortage of accessible land in the western area
- 'squatting' on state and private lands in the western area due to rapid urbanization
- Insecure tenure forms and rights due to the absence of a system of registration of titles
- Lack of proper cadastral mapping and land information
- Unclear and diverging tenure forms under customary law
- Overlapping jurisdictions for statutory and customary law
- Weak land administration and management, i.e., inadequate capacity within the responsible Ministry to carry out its scope of responsibility and meet set objectives
- Lack of proper cadastral and land use information database for state, private and customary lands, and
- Inadequate concession practices and protective mechanisms inserted to prevent 'land grabbing' in the commercial land use sector

4.3.2. National Environmental Policy (1994) and cultural heritage issues

The National Environmental Policy (1994) provides for the collection of relevant data on biological diversity and cultural heritage. It seeks to promote socioeconomic and cultural development through the preservation of biological diversity for the sustainable utilization of natural resources. There are references to the preservation and/or respectful removal (taking into consideration cultural sensitivities) of "society bushes" for large-scale agribusiness and other purposes in various regulations.

4.3.3. Development-Induced Resettlement Policy

This policy applies to any project, development, or business activity undertaken by either the government or private sector entities that results in, or is likely to result in, the physical or economic displacement of people. The policy establishes the rationale, objectives, guiding principles, and strategies for the undertaken involuntary resettlement.

In the policy, involuntary resettlement should always be considered as the last resort, conceived, planned, and implemented in a manner that minimizes the adverse impacts on PAPs and improve or at least maintain the standard of PAPs pre-impact through informed consultation of all stakeholders including vulnerable PAPs. The policy, which indicates that compensation must be at full replacement value, takes the position that compensation should be completed before physical movement and/or land take.

The RPF for this project provides ample guidance of how such issues will be addressed. This will include the preparation of site-specific RAPs or Livelihood Restoration Plans proportionate to the scale of impact. Project funds are expected to be used for compensation payment. The differences between the World Bank policies of resettlement and national policies have reduced considerably with the recent adoption of a new National Resettlement Policy. This is alluded to in the section of this report that addresses gaps in legislation.

4.4 Land Ownership and Tenure System

Land tenure in Sierra Leone is characterized by a dual ownership structure due to historical developments. Administratively, Sierra Leone is divided into the Western Area (which includes Freetown) and four regions from which fourteen districts emanate. Each district is divided into several chiefdoms, which are in turn sub divided into sections, towns and villages. The administrative heads of the districts are the District Officers. In all, there are 190 chiefdoms, each headed by a Paramount Chief. The sections are headed by Section Chiefs, the towns by the Town Chiefs and the villages by the Village Chiefs. The chiefs are not appointed by government but by their communities under customary law.

The Western Area, including the Freetown Peninsula, is governed by an English law adopted by the Courts Act of 1965 which regulates land ownership that includes fee conveyances, mortgages and leases. Unoccupied and uncultivated land remains Crown (State) land. Thus, land in these areas is either owned by individual families or is Crown land. Communally owned land does not exist in the Western Area.

Land in the rest of the country (i.e., the majority of the agricultural land) is held in communal ownership under customary tenure and is controlled by traditional rulers who administer it on behalf of their communities in accordance with customary principles and usage: customary law governs land tenure in conjunction with statutes. Though there are minor differences among the various ethnic communities, the general trend is that land is considered a divine heritage not to be bought and sold.

The responsibility to ensure the preservation of the land and subsequent enjoyment by future generations therefore rests on the community as a whole. The absolute interest in land vests in families. In other words, it is the land-owning family, which deals in its land. The Paramount Chief is regarded as the custodian of the land on behalf of the entire Chiefdom but decisions regarding the land are the preserve of heads of the various landowning families.

4.5 Relevant World Bank Environmental and Social Standards

The applicable World Bank Environmental and Social Standards for the preparation and implementation of this RPF include:

- ESS 1 – Assessment and Management of Environmental and Social Risks and Impacts
- ESS 5 – Land Acquisition, Restrictions on Land use and Involuntary Resettlement; and
- ESS 10 – Stakeholder Engagement and Information Disclosure.

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

ESS 1 requires that the Borrower will carry out an environmental and social assessment of the project to assess the environmental and social risks and impacts of the project throughout the

project life cycle. The assessment will be proportionate to the potential risks and impacts of the project, and will assess, in an integrated way, all relevant direct, indirect, and cumulative environmental and social risks and impacts throughout the project life cycle, including those specifically identified in ESSs 2–10. Therefore, the applicability of ESS5 which is the main ESS applicable to compensation and resettlement is established during the environmental and social assessment described in ESS1.

ESS 5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlements
The fundamental objective of resettlement planning, as stipulated in ESS 5, is to avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives. It further requires that projects must avoid forced eviction and mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by:

- providing timely compensation for loss of assets at replacement cost; and
- assisting displaced persons in their efforts to improve, or at least restore their livelihoods and living standards in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

The Standard also requires projects to improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure. Projects involving land acquisition and involuntary resettlement must also conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant. The project should also ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

ESS 5 further requires attention to be given to the needs of vulnerable groups especially those below the poverty line which in the context of the project will include:
Landless individuals and households;

- Elderly persons;
- Persons with disabilities
- Women and children;
- People living off the dumpsites (scavengers and pickers)
- Vendors, iterant and petty traders and informal operators on site; and
- Other disadvantaged persons as may be identified during the RAP preparation process.

The ESS 5 further requires the resettlement plan should include measures to ensure that the displaced persons are:

- informed about their options and rights pertaining to resettlement;
- consulted on, offered choices, and provided with technically and economically feasible resettlement alternatives;
- provided prompt and effective compensation at full replacement cost for losses of assets attributed directly to the project;
- provided assistance (such as moving allowances) during relocation where applicable; and

- provided with residential housing, or housing sites, or as required, agricultural lands for which a combination of productive potential, location advantages, and other factors is at least equivalent to the old site;
- offered support after displacement, for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standards of living; and
- provided with development assistance in addition to compensation measures, such as land preparation, credit facilities, training, or job opportunities.

Scope of ESS 5 application:

- The ESS applies to (a) persons who have formal legal rights to land or assets; (b) persons who do not have formal legal rights to land or assets but have a claim to land or assets that is recognized or recognizable under national law; or (c) persons who have no recognizable legal right or claim to the land or assets they occupy or use.

ESS 10 - Stakeholder Engagement and Information Disclosure

ESS 10 required the project to engage with stakeholders throughout the project life cycle, from the preparation stage and during project implementation, and in a timeframe that enables meaningful consultations with stakeholders.

Resettlement related activities are expected to be planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected, and addressing and responding to grievances.

4.6 Comparative analysis of national legal frameworks with ESS5

The law, regulations and requirements for resettlement in Sierra Leone are not fully compatible and there are some differences with that of World Bank ESS 5. In the case of any gaps between the national law and ESS 5, gap filling measures have been identified in Table 2-1 below and the provisions that provide the highest protection of the PAPs will be adopted. In this case the ESS 5 will apply in accordance with this RPF.

Table 4-1: Comparison of Sierra Leonean Regulations with World Bank's ESS5

Issue	National law	ESS5	Gaps	Gap filling measures	Strategy
Public consultation and information disclosure	The owner/tenants on the land must be formally notified at least a week in advance of the intent to enter and be given at least 24-hour notice before actual entry.	Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementation and monitoring of resettlement.	ESS 5 provides for continuous consultation while it is prescriptive timeframe in the Sierra Leone law.	Displaced persons and their communities will be provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementation and monitoring of resettlement.	The project Stakeholder Engagement Plan provides mechanisms to ensure informed participation throughout project life cycle, from inception to completion. A feedback system will be ensured during project life. MIC responsible for consultation and disclosure.
Timing of Compensation Payment	Prompt	Prior to displacement and relocation.	Sierra Leonean law is ambiguous in terms of the exact timing of compensation payment; ESS5 is more precise.	Compensation payments will be done prior to displacement	MIC, Local authorities, Local Community members, etc., will all play a role in monitoring to ensure this provision is complied with
Calculation of Compensation	Fair and adequate	Full replacement cost	Reference to 'fair and adequate' compensation without appropriate qualification under Sierra	The Full Replacement Cost Approach (RCA) will be adopted for the calculation of compensation.	MIC, with local authorities, valuator and the affected persons will participate in the valuation process.

Issue	National law	ESS5	Gaps	Gap filling measures	Strategy
			Leonean Law makes it subject to manipulation by elites; ESS5 is more precise.		
Payment of Compensation	Cash Compensation is based on market value	Entitled to in-kind compensation or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement. Preference should be given to land-based resettlement (land to land) to PAPs whose livelihood is land-based.	Market value is applicable under Sierra Leonean law – inclusive of depreciation and not considering labour, other transactional costs, in-kind compensation or reinstatement.	Compensation payments will be in-kind or cash as agreed with the PAP at full replacement cost including labour and relocation expenses, prior to displacement.	MIC, with local authorities and valuator will develop compensation and MIC will be responsible for final approval and payment.
Encroachers/ squatters	No legal provisions are made for entitlements for people without titles to land, i.e., squatters/ encroachers.	People without title may be entitled for transitional allowance to assist them relocate from land that they occupy. People who encroach on the area after the cut-off date are not entitled to compensation or any form of resettlement assistance.	ESS5 provides for compensation for squatters but Sierra Leonean law does not.	Squatters will be entitled to compensation for investments and assets made on land except for the land itself regardless of legal tenure provided these investments were done before cut-off regardless of legal tenure.	MIC in coordination with local authorities and valuators will ensure this.
Livelihood restoration and	No provision. National Law	Provide additional targeted assistance (e.g., credit facilities, training or	Sierra Leonean law is silent on livelihood	Resettlement assistance in terms of moving allowances,	MIC and Councils will be responsible for this.

Issue	National law	ESS5	Gaps	Gap filling measures	Strategy
resettlement assistance	does not specify assistance.	job opportunities) and opportunities to improve or at least restore their income earning capacity, production levels and standards of living to economically displaced persons whose livelihoods or income levels are adversely affected. For a transitional period.	restoration as an integral part for resettlement and no planning or resources are allocated to this activity.	loss of earnings etc. will form part of compensation framework, in addition to longer term livelihood development program.	
Support to vulnerable groups	No legal provision; compensation for expropriated property can be determined.	According to World Bank policy special attention must be given to vulnerable groups. They are entitled to additional compensation, legal assistance during resettlement and help during physical relocation.	No special attention, provisions or treatment are prescribed for vulnerable persons under Sierra Leonean Law.	Particular attention will be made to identify vulnerable, or potentially vulnerable households at time of baseline surveys, for special consideration based on scale of impact.	MIC and local authorities will identify vulnerable groups during the socio-economic survey.
Treatment of residential and business renters (tenants)	Fixed improvements introduced by renters on the land or structures automatically belongs to the landowner, unless there is a specific provision that the owner will	Compensation at full replacement cost for (i) loss of structures/assets other than land; (ii) resettlement assistance; and (iii) other assistance, as may be necessary to restore to pre – project levels at least.	ESS5 provides for compensation for all land tenants but Sierra Leone law subjects any compensation to prevailing laws	Renter will be provided compensation for transfer costs and disturbance, compensation for temporary closure of the business establishment while transfer is ongoing.	Responsible for compensation.

Issue	National law	ESS5	Gaps	Gap filling measures	Strategy
	compensate the renter for any fixed improvements introduced by the latter. The practice is to ask the landowner to sign a waiver, allowing the renter to be paid compensation for any fixed improvements.				
Grievances	The law prescribes the possibility of appealing throughout expropriation phases with statutory limits.	World Bank ESS5 requires that a GRM is established to provide appropriate and accessible avenue for PAPs complaints to be received to facilitate the resolution of any grievance.	ESS5 provides for resolving resettlement through project structures first before the law court	Appropriate and accessible grievance mechanisms to be established in the RPF.	Detailed grievance mechanism in place and articulated through Public Consultation and Disclosure Plan, with recourse to court of law if need be. The GRM will be accessible at no cost, reliable and transparent and will be publicly disclosed.
Monitoring and Evaluation	No provision	Requires monitoring and reporting on effectiveness of RAP implementation and post RAP to ascertain if livelihoods have been restored.	No M&E provision under the Sierra Leone Law.	Detailed monitoring, evaluation and monitoring program built into the overall project management process.	Monitoring will be internally and externally done. MIC and local council are the responsible bodies.

4.7 Institutional and Administration Framework

This section provides an overview of the statutory organs with mandate to supervise or monitor the implementation of the RAP. These institutions are listed below:

4.7.2. Ministry of Finance (MoF):

this ministry has the broad responsibility for financial management, procurement, and monitoring and evaluation functions of the project. The ministry is responsible for mobilization of external and internal resources necessary to pay compensation to project affected persons in the case of resettlement of restriction of access to economic resources; and ensure the timely releases of funds for payment of compensation to project affected persons. All other implementation-related costs including for grievance management, public disclosures, monitoring and evaluation etc., will be borne by the project funds. Ministry of Justice (MoJ): this ministry is responsible for legal matters regarding land ownership. They will be responsible for drafting Executive Instruments for getting the needed land for the project.

4.7.3. Ministry of Local Government and Rural Development (MLGRD):

The MLGRD monitors and coordinate work at local government level. The ministry will provide supervisory role on local council's cooperation on the project and help in the area of giving directives on relevant sector policies to guide project implementation.

4.7.4. Environment Protection Agency (EPA):

The EPA is the agency responsible for national environmental protection, conservation and promotion and overall management, including advisory role to the government on all matters pertinent to the environment and climate change. During ESHIA process, EPA assess whether land acquisition issues are considered in the ESHIA report and mitigation measures are proposed. The EPA will be responsible for the overall supervision of the monitoring program and for screening and appraising the RAP as well as monitoring and evaluating resettlement/rehabilitation process.

4.7.8. Municipal/district authorities:

As local government authorities at the municipal and district level, the municipal and district councils will liaise with the MIC to implement the project. They will be involved in providing cash compensation for PAPs and support them to relocate to their new land parcels.

4.7.9. Traditional authorities:

for the purpose of this project, community elders and chiefs will play a key role in identifying Projected Affected Persons for compensation purposes.

4.7.10. Civil Society Organisations (CSOs)/Consumer associations:

The CSOs will serve as the voice of the local people. They participate in public hearings of ESHIAs and RAPs and in addressing the concerns of the communities. With regards to the implementation of the SLDTP where resettlements and compensations are triggered, they will serve as independent advocacy bodies to validate compensations and resettlement schemes, help with sensitization and awareness programs, facilitation and transparency and grievance redress.

4.7.11. World Bank (WB):

The WB will review and give No Objection to the RPF/RAP/ARAP; disclose the approved report on the World Bank External Website; and conduct periodic site visits/monitoring and audits as needed to check compliance.

4.7.12 Administrative/ Implementation Arrangement

Ministry of Information and Communications

The MIC has the overall responsibility for the development and implementation of the RPF and RAPs. The SL DTP will be implemented by the MIC, where Project Coordinating Unit (PCU) will be hosted. The PCU will manage the day-to-day coordination of project activities. The PCU will be responsible for the preparation of annual work plans and budgets, fiduciary arrangements and reporting, preparation of Terms of Reference and specifications, project monitoring and reporting, as well as general stakeholder coordination. MIC will coordinate with all implementing agencies of digital transformation specific project components, and serve as communication lead for project activities and outcomes. It will oversee the compensation exercise and will ensure that PAPs are fully compensated. The PCU will be staffed with a Project Coordinator, Deputy Project Coordinator, Procurement Specialist, Environmental and Social Safeguards Specialist, Financial Management Specialist and Accountants, Monitoring and Evaluation Specialist, and a Communication Specialist, as well as a number of Consultants and Technical Experts supporting project implementation.

A Project Steering Committee and Project Management Team will be established to provide strategic oversight and governance of the project. The project steering committee will:

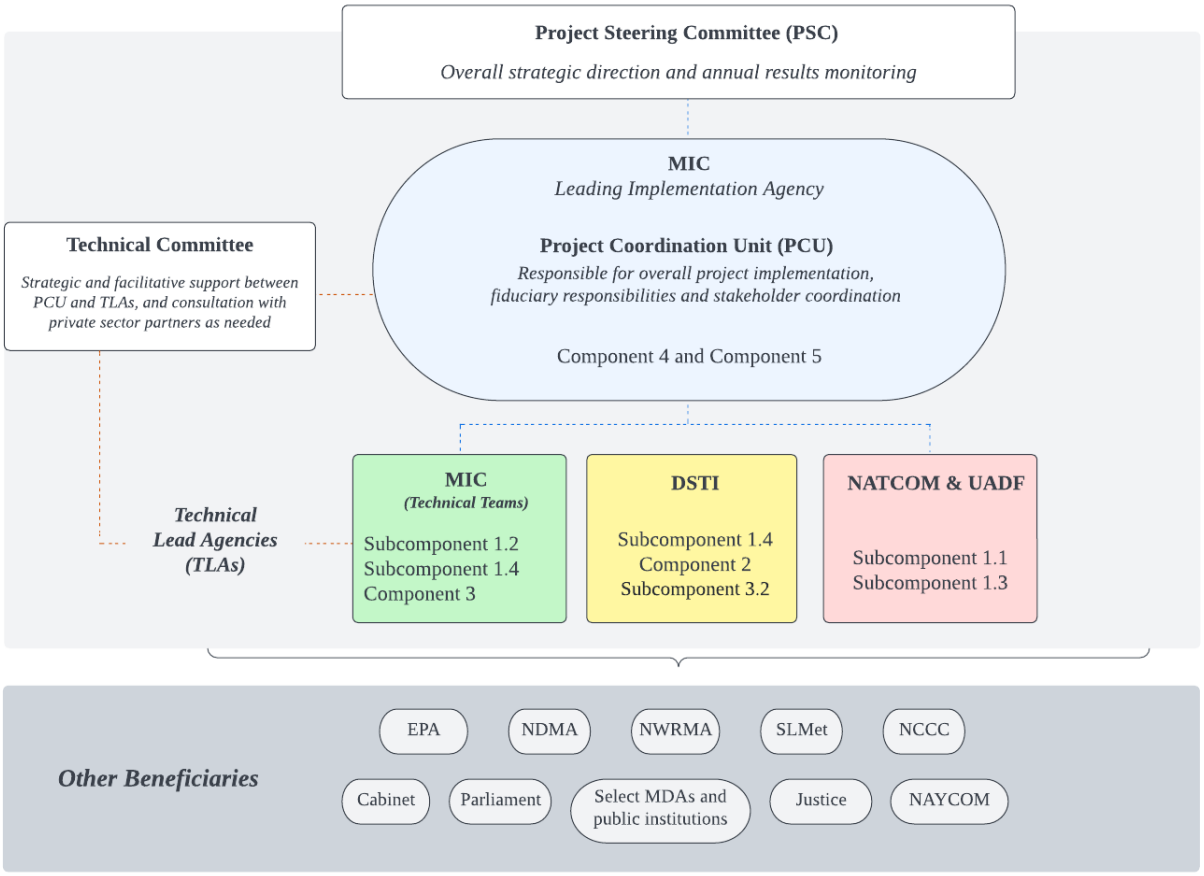
- Provide guidance on strategic policy and implementation issues
- Coordinate activities of the ministries, department and agencies and other stakeholders involved in the project implementation
- Review and approve annual work plans, budget and annual reports
- Review and discuss quarterly and annual progress reports and make necessary recommendations; and
- Assess the progress towards achieving the project's objectives and take corrective action if necessary
- Resolving cross-sectoral and issues above the Project Coordinating Unit

The PSC will be co-chaired by the Ministers of MoF and MIC or their designees. The PSC will constitute a wide range of government stakeholders to the country's digital transformation agenda,

including but not limited to: DSTI, NATCOM, UADF, NCRA, Central Bank of Sierra Leone (BSL), National Revenue Authority (NRA), Ministry of Trade and Industry. The PSC will meet quarterly to assess the project implementation progress on the ground including ensuring safeguards due diligence and undertake site visits as necessary.

The following figure shows the project implementation arrangements:

Figure 4-1: Project Administrative arrangements



5 SOCIOECONOMIC BASELINE CONDITIONS

This Section describes the environmental and social baseline conditions in the country. The environmental and social baseline information is given for a wide area to provide additional context.

5.1 Location and physical environment

Sierra Leone is located on the west coast of Africa, between the 7th and 10th parallels north of the equator. Sierra Leone is bordered by Guinea to the north and northeast, Liberia to the south and southeast, and the Atlantic Ocean to the west. The country has a total area of 71,740 square kilometres divided into a land area of 71,620 square kilometres and water of 120 square kilometres. Sierra Leone has a tropical climate, with a diverse environment ranging from savannah to rainforests. Sierra Leone has four main physical regions: the Freetown Peninsula raised beaches and hills, the Coastal Plains, the Interior Lowlands, and the Interior Plateau. The Freetown peninsula consists of three roughly parallel ranges of highlands that are narrow but extend about 30km south of Freetown. The hills and mountains in these highlands rise impressively from 200 to 1000m above the low-lying narrow coastal area.

The Interior Lowlands region makes up about half of the country. Most of the area, which is largely swamp, is less than 150m above sea level. The Interior Plateau region makes up the eastern half of the country. It is the most extensive physical region and includes the greatest variety of land forms. It is 300 to 450m above sea level. The Interior Plateau is dissected by the main rivers flowing westward towards the sea. Rising above the general level of this region are a number of hills and mountains, including the Kambui, Nimini, and Gori hills and the Sula, Kangari, Loma, Tingi, and Wara Mountains. As of July 2017, Sierra Leone is divided into 5 administrative regions: the Northern, Eastern, Southern, North-Western Provinces and Western Area and sixteen (16) administrative Districts: Kailahun, Kenema, Kono, Bo, Bonthe, Pujehun, Moyamba, Bombali, Tonkolili, Koinadugu, Falaba, Karene, Port Loko, Kambia, Western Area Urban and Western Area Rural. Previously, it was 4 regions and fourteen (14) Districts and 190 chiefdoms (see Figure 5-1).



Figure 5-1: Political Map of Sierra Leone with Districts and Chiefdoms

For detailed biophysical environment baseline information of the project context, reference is made to sections of the Environmental and Social Management Framework.

5.2 Socio-economic Environment

5.2.1. Overview of economy

According to the results of the 2004 Sierra Leone Population and Housing Census, the population of Sierra Leone is estimated at about 4.9 million in an estimated 819,854 households. For the period 1985-2004, the population growth rate was estimated at 1.8 percent. About 64 percent of the population resides in rural areas.

Sierra Leone was ranked last among the 177 countries surveyed globally in the 2007/2008 United Nations Human Development Index, with a per capita GDP of about US$806, a life expectancy of 41.8 years, and an adult literacy rate of 34.8 percent. The UNDP 2007/2008 Human Development Report estimates that in 2005 about 52 percent of the population lived on less than US$1 a day (UNDP, 2007).

The most recent household income and expenditure survey (2003-04) showed that about 70 percent of the population lives below the poverty line according to the National Poverty Line of Le 2,111 per day (SSL,2004). Overall, poverty is highest in rural areas, with 79 percent of the rural population living below the poverty line. The most acute form of poverty, insufficient food, is concentrated mainly in rural areas. About 68 percent of the population cannot afford enough food to eat. Three out of four people (75 percent) in rural areas outside Freetown do not attain the minimum daily calorie intake (2700 calories). The poor in Sierra Leone can meet only about 71 percent of their basic needs.

The rebel war resulted in a substantial reduction in the standard of living and, for many people, reduced access to food. A poor and undernourished population is more susceptible to various diseases. Thus, rising maternal and child mortality rates, increasing rates of illiteracy, and rising unemployment levels characterize the living conditions in many parts of Sierra Leone. The HIV/AIDS pandemic has also had a major impact on all sectors of the economy through loss of production and labour force. Against this background, the government of Sierra Leone in 2005 launched the Economic Recovery Strategy, aimed at restoring economic growth, generating employment opportunities, and reducing poverty levels (Poverty Reduction Strategy Paper, March 2005).

5.2.2. Population

The current population of Sierra Leone is 8,264,042 based on projections of the latest United Nations data. The growth rate in Sierra Leone has been above average throughout its history, and the steady increase in population is still going on today and the annual rate of change has been over 2% since around the turn of the century. The median age in Sierra Leone is 18.5 years, which is disproportionately young and makes for a very young working population. The average woman gives birth to roughly 4.5 children, and this high birth rate is the cause of the substantial growth rate in the country.

The annual growth rate in Sierra Leone is not expected to remain over 2% for much longer. Current projections believe that the rate of growth will peak at 2.14% in 2020 before declining towards 1.22% by the year 2050- a fairly drastic drop. The population numbers will still change pretty drastically during this time, however. The same set of predictions state that the population of Sierra Leone will be 8,046,931 in 2020, 9,719,531 in 2030, 11,403,087 in 2040 and 12,971,626 by the year 2050.

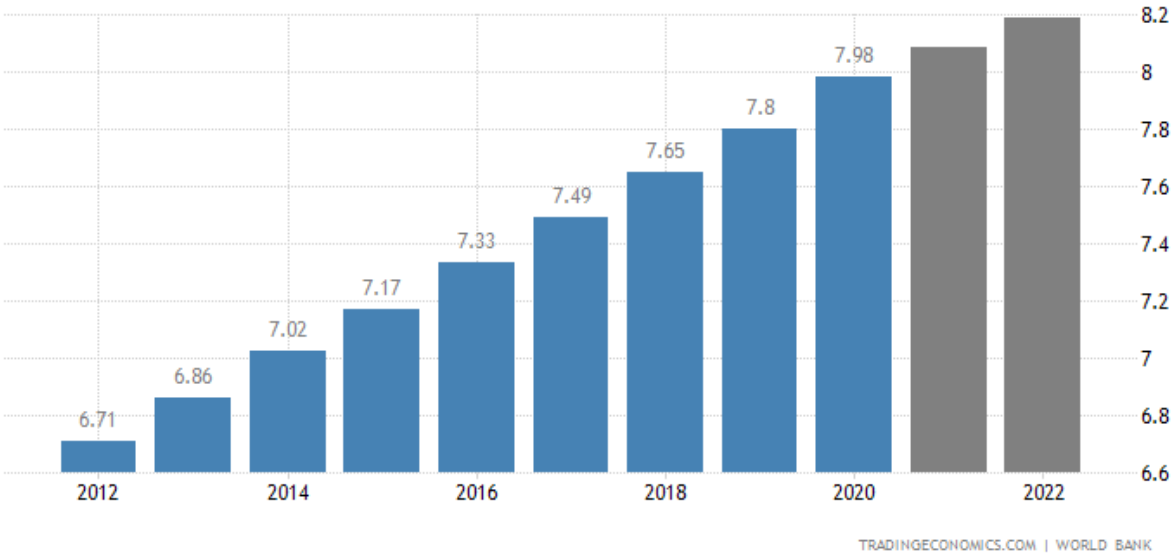


Figure 5-2: Population Distribution of Sierra Leone
Source: United Nations Data (World Population Review) and World Bank (TradingEconomic.com)

5.2.3. Land Ownership

Sierra Leone has a dual land tenure system dispersed in about twenty statutes and regulations. Different ownership of land exists in the Western Area (Freetown) and the Provinces. Land can be owned from the following; categories in Sierra Leone: Private land, state land, communal land and family land. State land and private landownership operate in the Western Area. State or public lands are mostly unoccupied land, and land compulsorily acquired by the Government. Private land is land in which an individual has a freehold interest.

In the provinces, customary law co-exists with the statute. The recognition of the force of customary law in the provinces is established by section 76 (1) of the Courts Act 1965. Through customary law, ownership of land is vested in the chiefdoms and communities; and can never be owned freehold. Land always belongs to the communities under the different forms of tenure under customary law. This principle is established by the Chiefdom Councils Act as well as by Section 28 (d) of the Local Government Act 2004. Most land in the provinces is considered common property and tenure are based on non-title usufruct and traditional rights. The Paramount Chief is considered the traditional custodian of the land and ultimately grants access to households. Most households have access to family farm plots that are allocated to family members by the family elders (head of household). Households without access to family lands may be allocated land to be used only for food crops. However, the land reverts to the household with the original traditional rights afterward. Land ownership for specific usage such as resettlement of a village can be considered on condition of an agreed sum being paid to the traditional household owner(s).

5.3 Gender Based Violence (GBV) in Sierra Leone

Although gender-based violence (GBV) is a global problem, recent research in West Africa suggests that this problem becomes particularly acute in post-conflict countries. It is widely estimated that during Sierra Leone's civil war from 1991 - 2002, up to 250,000 women and girls

were victims of GBV. Rape was used systematically by all factions and, although peace was declared in 2002, the trauma of war has left scars which run through the fabric of households, families and communities.

In the urban areas of Sierra Leone, about 70 percent of the population is self-employed and largely engaged in petty trading in the informal sector. Many of the women, and men, involved in informal trading do so on a survival consumption basis, to sustain the welfare and basic consumption of their households.

More men have access to paid jobs, while women tend to occupy less well-remunerated enterprises within the informal sector. In Sierra Leone, 12.4 percent of parliamentary seats are held by women, and 19.2 percent of adult women have reached at least a secondary level of education compared to 32.3 percent of their male counterparts. In the urban slum setting in Freetown, mostly along the coastline, cross-border trade is an important source of livelihood support, with 63 percent of urban women engaged in informal economic activities, mostly petty trading and farming (Howard 2016). These disparities result from cultural and social barriers that discriminate against women's full socioeconomic participation (African Development Bank 2016).

GBV in Sierra Leone is a persistent problem which studies have shown affects nearly all Sierra Leonean women who experience it in some form or other during their lifetime. According to the Sierra Leone Demographic and Health Survey 2019, 61 percent of women ages 15–49 have experienced physical violence since age 15, and 7 percent have experienced sexual violence. When it comes to intimate partner violence (IPV), 62 percent of ever married women have, at least once in their lifetime, experienced physical, sexual, or emotional violence (SSL and ICF International 2020). GBV takes various forms including domestic violence (physical, economic, and emotional/psychological), communal/cultural violence, sexual violence, and structural violence (equal rights discrimination), with domestic violence being the most common.

Sierra Leone is also a highly patriarchal society, and institutionalized gender inequalities are exacerbated by discriminatory behaviours, particularly with relation to marriage, property rights, and sexual offences. The high levels of illiteracy and poverty among Sierra Leonean women prevent them from upholding many of their internationally recognized rights. Similarly, economic insecurity contributes to women's vulnerability to GBV, and their marginalization from local and national decision-making processes further limits their ability to redress these gender inequalities.

According to United Nations Population Fund (UNFPA) of Sierra Leone, gender-based violence (GBV) is a serious and urgent concern. An estimated 62 per cent of women age 15–49 report having experienced physical or sexual violence, according to the 2019 Sierra Leone Demographic and Health Survey (SLDHS). With the onset of the COVID-19 pandemic, it was feared that the rates of GBV, which were already unacceptably high in Sierra Leone, would be exacerbated. Sixty one percent of ever-married women age 15-49 have experienced spousal violence whether physical, sexual or emotional by their husband or partner.

5.4 Other Vulnerable Groups

There are 310,973 persons with disability in Sierra Leone, accounting for 4.3% of the total population, according to the Sierra Leone Integrated Household Survey Report 2018. Among the

population with disability, 162,208 are within the working ages of 15–64 years. Among the population with disability, a total of 93,843 (57.8 percent) persons were employed the last week preceding the survey. Of the 57.8 percent of persons with disability employed, 74.4 percent are self-employed, and 15 percent are engaged in help without pay in households or businesses. Only 6.7 percent are regular employees.

Child labour is common in Sierra Leone. Children living in the poorest households in Freetown and other major cities are most often involved in child labour. Many children living in Freetown are used as hawkers, spending long hours selling various items and pulling wheelbarrows, instead of being at school. This is in contravention of the ILO Convention 182 which prohibits the use of child labour. Street trading in the city of Freetown is a very serious problem.

According to the UNDP, approximately 2.7 million of Sierra Leone's population are youth ages 15−35 years. The unemployment rate is higher among youth than those ages 35 and above. A lack of skills and experience is cited as one of the main reasons for the high youth unemployment rate. An ILO survey (SWTS Country brief, Sierra Leone. ILO, January 2017) registered a high youth labour underutilization rate, particularly among young women: it was 72.8 percent for young women and 59.9 percent for young men. The share of underutilized labour potential consisted of 48.5 percent of the youth population in irregular employment (either in self-employment or paid employment with contract duration less than 12 months), 11.8 percent unemployed, and 5.9 percent inactive non-students.

More than three in four (78.5 percent) employed youth remained in vulnerable employment as own account workers (34.6 percent) or unpaid family workers (43.7 percent).

5.5 Collection, Treatment, and Disposal of e-Waste

Sierra Leone is at an infant stage of developing necessary management strategies, standards and policies to reduce the adverse health and environmental effects of e-waste. Although Sierra Leone has accepted the Basel Convention on the Control of Trans boundary Movements of Hazardous Wastes and their Disposal, there is no national policy to guide or manage e-waste in the country. There are also no e-waste recycling facilities, no battery recycling facilities and no attempt to manage the e-waste that burdens the country. The overarching objective of the Basel Convention is to protect human health and the environment against the adverse effects of hazardous wastes.

According to a 2016 statement made by UN, only about 20% of all e-waste present in Sierra Leone were recycled; and low recycling rates can have negative economic impact on the country.

6 RESETTLEMENT PRINCPLES AND PROCEDURES

6.1 Resettlement Principles and Objectives

The World Bank believes that involuntary land acquisition, restrictions on land use and involuntary resettlement caused by infrastructure projects, if unmitigated, could give rise to severe economic, social, and environmental risks and impacts such as adverse impacts on production systems, loss of productive assets or income sources, access to land, the performance of community institutions and social networks, kin groups ability to live and work together, and cultural identity and traditional authority. In anticipation of these social risks and impacts, ESS5 requires a Project to provide measures to address and mitigate project related resettlement risks and impacts.

The overall objective regarding resettlement and rehabilitation principles adopted in the implementation of the project will be to avoid or minimize involuntary resettlements by exploring all viable alternative project designs. Minimization and mitigation would require careful planning and implementation. When the details of land acquisition and involuntary resettlement are fully known, a Resettlement Action Plan (RAP) will be prepared to provide an implementation guide for the operation. However, if the location of land acquisition, access to restriction and involuntary resettlement are not fully known, the Resettlement Policy Framework will provide the policy principles for the development of specific RAP which will be consulted upon and disclosed to the public and the affected persons. When, subsequently, the outline of each initiative is known and there is sufficient detail, a RAP will be developed for that operation in accordance with this RPF. The RPF will provide for compensation at replacement cost, resettlement and rehabilitation assistance to all project affected persons (loss of land, residences, business establishments and other such immovable properties), including the informal dwellers/squatters in the corridor footprint. This section highlights the guiding principles and strategies to guide resettlement under this RPF.

The RPF for SL DTP Project will therefore adopt the following principles and guidelines:

(i) Involuntary resettlement and land acquisition will be avoided where feasible, or minimized, where it cannot be eliminated.
(ii) Where involuntary resettlement and land acquisition are unavoidable, resettlement and compensation will be provided to the PAPs which provide sustainable development programs, providing resources to give PAPs equal opportunity to share project benefits.
(iii) PAPs will be assisted to improve their livelihoods and standards of living or at least to restore them, in real terms, before displacement levels or levels prevailing prior to the beginning of the project implementation, whichever is higher. Impacts on the PAPs are measured by the quantity of land and assets to be acquired/lost and residual land/assets and their economic viability. Once the severity of impact has been considered an entitlement option is selected.
(iv) PAPs will be meaningfully consulted to ensure inclusion and participation of different groups as women, men and PWDs in the implementation of both the resettlement and SL DTP Project.
(v) PAPs would be given full information on the qualification (eligibility), mode of compensation, the restoring plan of production income, the project's progress and be involved in the enforcement of resettlement arrangements (community participation).

(vi) Compensation and rehabilitation assistance will be paid before displacement. The land and/or property affected would be taken only when the PAPs are satisfied with the compensation arrangements. No civil works will be initiated unless compensation for land and assets and rehabilitation assistance is provided to all eligible PAPs.

(vii) The implementing agency and/or contracting entity would supervise the resettlement activities including the payment of compensation as well as monitoring and evaluation.

(viii) Establish a grievance redress mechanism to receive and address specific concerns about compensation and relocation that are raised by displaced person, if any. And to resolve all other grievances related to the project

(ix) All activities related to resettlement planning, implementation and monitoring will ensure involvement of vulnerable groups (including women, elderly persons and PWDs) and incorporate special measures and assistance for vulnerable groups.

When specific site locations are determined during implementation, the project will follow a systematic process and procedures to guide the preparation, approval and implementation of the Resettlement Plan as discussed below:

6.2 Resettlement Procedures

6.2.1. The Screening Process

Once a particular physical infrastructure sub-project of the SL DTP Project location/corridor is known, MIC shall screen the sub-project investment. The main purpose is to identify sub-project sites which will potentially have resettlement and land acquisition issues and provide adequate measures to address the impacts. The screening process ensures that SL DTP Project sub-projects complies with the ESS 5. MIC will be responsible for screening the proposed sub-projects by using a screening checklist. The screening will determine whether a particular sub-project requires land. The screening among others will seek to answer the following questions:

- Will the sub-project activities result in land take, displacement, loss of assets, or access to assets; and
- Will the sub-project activities result in the permanent or temporary loss of crops, fruit trees, and household infrastructure?

If the answers are “No”, the activities pose no resettlement concern. If one or more of the answers are “Yes”, then a Resettlement Action Plan (RAP) is required. The findings are then verified for decision-making. MIC, the PCU, shall recruit consultant(s) to prepare a RAP which will entail amongst others a socioeconomic baseline survey to be followed by the preparation of the plan. The completed plan is to be submitted to the client for review and further to the World Bank for review and clearance.

The review will assess whether associated mitigating measures that will be necessary before the construction phase have been defined in sufficient detail and appropriate budget and funding is available for implementation.

The screening activity should be undertaken at the initial stage of the project cycle for compliance with national legislation and ESS 5 requirements.

6.2.2. Preparation of Resettlement Action Plan

Individual sub-project RAP, consistent with this RPF, will be prepared and submitted to the World Bank for review and approval. According to ESS 5, the scope and level of detail of the resettlement plan vary with the magnitude and complexity of land acquisition or/and resettlement impact.

A full RAP shall include at minimum the following:

- Description of the sub-project and identification of the sub-project area
- Identification of sub-project activities that give rise to resettlement
- Consideration of alternatives to avoid or minimize resettlement and consultation with affected people about acceptable alternatives
- Establish mechanisms to minimize resettlement, to the extent possible, during project implementation
- Provide comprehensive socioeconomic studies including:
    i. Census survey covering current occupants of the affected area to establish a basis for the design of the resettlement program and to exclude subsequent inflows of people from eligibility for compensation and resettlement assistance after the cut-off date
    ii. Standard characteristics of displaced households, including a description of production systems, labour, and household organization
    iii. Baseline information on livelihoods (including, as relevant, production levels and income derived from both formal and informal economic activities) and standards of living (including health status) of the displaced population
    iv. The magnitude of the expected loss-total or partial-of assets, and the extent of displacement, physical or economic, information on vulnerable groups or persons
    v. Information on vulnerable groups, particularly those below the poverty line, old, women and children, ethnic groups and other resettled persons not protected by Law of Expropriation, and for whom special measures must be taken
- Analyze legal framework, cover gaps, if any, between local laws covering eminent domain and resettlement and the World Bank ESS 5, and the mechanisms to bridge such gaps
- Establish institutional framework, institutional responsibility for implementation, eligibility, valuation of and compensation for losses and the methodology to be used in valuing losses

- Establish grievance procedures, implementation arrangements, monitoring and evaluation, cost and budget

A Draft version of the RAP prepared by MIC will be shared with the World Bank for approval before public disclosure and implementation. Sub-project implementation will start after RAP has been implemented. Once the implementation of the RAP is completed, MIC will prepare a RAP completion report, and the report will be submitted to the Bank for "No Objection". Once the RAP completion report is done than the awarding of the contracts for the works can be finalized.

Any changes to the RAP during implementation will require approval from the World Bank and the Government of Sierra Leone. For each sub-project, that will require acquisition of additional land, a different RAP will be created.

6.2.3. Consultations

During the entire process of preparing the RAP, consultations with the public is essential as it offers the affected persons an opportunity to participate and contribute to both design and implementation of the project activities. Consultation will be done through stakeholders' meetings and workshops at suitable locations, and the official residence or offices of the local leaders. The information will be made available to each household on entitlement, eligibility criteria, and modes of compensation and assistance, complaints and grievances resolution procedures. The project has prepared a Stakeholder Engagement Plan to guide project consultations including with vulnerable individuals and groups.

To ensure transparency of procedures, PAPs shall be informed of the method of valuation employed to assess their assets albeit that compensation shall be no less than full replacement cost, in accordance with ESS5. The project will keep documentation and provide reports that detail what actions were taken in these areas. Vulnerable people will be identified at census stage. Each RAP developed under Scale-Up will make precise provisions with respect to assistance to vulnerable groups, for example amongst assistance possibilities listed above.

6.2.4. Baseline/ Census Survey

As part of the preparation of the RAP, socioeconomic census and asset inventory will be conducted to determine the scope and nature of land acquisition and resettlement impacts and establish the status of the displaced persons. The socioeconomic census will focus on the dynamics of PAPs and their livelihoods (source of income, poverty status, ethnicity, education, health situation, land holding, housing type and value etc.). It will also identify vulnerable individuals or groups that will require differentiated resettlement measures. An important aspect of preparing a RAP is to establish appropriate data to identify the persons/household /community and their assets which will be affected, determine people eligible for compensation and assistance, and to discourage inflow of people who are ineligible for these benefits. In essence, the census will achieve the following:

- Provide initial information on the scale of resettlement to be undertaken

- Identify gaps in information and gives an indication of further socioeconomic research needed to quantify losses to be compensated and, if required, to design appropriate development interventions
- Establish indicators that can be measured at a later date during monitoring and evaluation

Based on these survey data the RAP will be compiled.

6.2.5. Relocation and compensation

The MIC will oversee the implementation of the RAP once it is completed and approved. The implementation of the RAP commands priority over the implementation of the investment component of the project to ensure that displacement or restriction of access does not occur before the necessary measures for resettlement are in place. The handing over of properties such as land and buildings and compensation payments will be made in the presence of the affected party and officials of MIC, the Local Councils and trusted community representatives. A compensation dossier containing necessary personal information on the affected party and those that s/he claims as household members, total land holdings, inventory of assets affected compensation amount received with all parties and witnesses signed, shall be documented as appropriate and tracked, in both hard and soft copies. MIC will ensure that compensation is affected in line with the national laws and the World Bank ESF.

7 ELIGIBILITY AND ENTITLEMENTS

This section outlines eligibility criteria, which are necessary to determine who will be eligible for resettlement and benefits, and to discourage inflow of ineligible people.

7.1 Identification of Project Affected People

Project affected people or household (PAPs), are defined as "persons affected by land acquisition, relocation or loss of income associated with (a) acquisition of land or other assets, and (b) restriction of access to legally designated parks or protected areas."

ESS 5 defines three categories of affected persons who are eligible:

a. Those who have formal legal rights to land or assets (including customary/communal land, traditional and religious rights, recognized under Sierra Leonean Law);
b. Those who do not have formal legal rights to land or assets at the time the census begins, but have a claim to such land or assets that are recognized or recognizable under national law and local laws of Sierra Leone or become recognized through a process identified in the resettlement plan; and
c. Those who have no recognizable legal right or claim to the land or assets they are occupying, using or getting their livelihood from, but are recognized under the ESS 5.

The standard specifies that those individuals covered under (a) and (b) above are to be provided compensation for land they lose, and other assistance in accordance with the policy. Individuals covered under (c) above are to be provided with resettlement assistance in lieu of compensation for the land they occupy, and other assistance, as necessary, to achieve the objectives set out in this policy, if they occupy the project area prior to a cut-off date established by the management committees in close consultation with the potential PAPs, local community leaders and the respective local land administrative arrangements and the ESF and acceptable to the World Bank. Persons who encroach on the area after the cut-off date are not entitled to compensation or any other form of resettlement assistance. Cash compensation and resettlement assistance for losses will be prioritized over land for land compensation.

There will therefore be a package of compensation and other resettlement measures to assist each category of eligible displaced persons to achieve the objective of the policy. Eligibility will also be assessed using the following information:

- **Loss of property:** this includes loss of houses, crops and trees, structures, fixed improvements and businesses. In cases where the loss is partial, the disposition of salvage material will be exercised. Cash payments may also be made if a small fraction of property is lost instead of replacing the whole property, but if the partial loss results in PAPs not being economically viable then the property is replaced. Those who lose houses will also be assisted with temporary residence if necessary.
- **Loss of wages and income:** these are persons whose income sources are disrupted due to the Project. Where disruption of businesses or employment occurs in the process of relocation, they should be entitled to transitional income support. Compensation equivalent to lost income required for the duration of impact should be paid.

In addition, PAPs will be entitled to transitional assistance, which include moving expenses, temporary residence if necessary, and opportunities to employment in the Project. It is also important to note the eligibility may be claimed collectively, not necessarily just by individuals or families.

7.2 Proof of Eligibility

The implementing Agencies or Contracting Entities will consider various forms of evidence as proof of eligibility to cover:

- Affected persons with formal legal rights, documents in the form of land title registration certificates, leasehold indentures, tenancy agreements, rent receipts, building and planning permits, business operating licenses, and utility bills among others. Unprocessed/ unregistered formal legal documents will not bar eligibility and procedures for confirming the authenticity of such documents will be established in the sub-project specific RAP.
- Affected persons with no formal or recognized legal rights - Criteria for establishing non-formal, undocumented, or unrecognized claims to eligibility shall be established paying particular attention to each situation and its peculiarities. Alternative means of proof of eligibility will include:
    - An affidavit signed by landlords and tenants;
    - Witnessing or evidence by recognized traditional authority, customary heads, community elders, family heads and elders and the general community.

7.3 Eligibility for Community Compensation

It is also important to note that the eligibility may be claimed collectively, e.g., as a community or religious group and does not necessarily have to be individuals or families. Communities (on communal lands) that permanently lose land and/or access to assets and or resources under statutory or customary rights will be eligible for compensation. Example of community compensation could be for grazing lands, or access to other communal assets, community water wells, etc. The rationale for this is to ensure that the pre-project socioeconomic status of communities where adversely impacted is also restored.

7.4 Economic Displacement

If land acquisition for a sub-project causes loss of income or livelihood, regardless of whether or not the affected people are physically displaced, the project will meet the following requirements:

i. Promptly compensate economically displaced persons for loss of assets or access to assets at full replacement cost;
ii. In cases where land acquisition affects commercial structures, compensate the affected business owner for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery or other equipment;
iii. Provide replacement property (e.g., agricultural or commercial sites) of equal or greater value, or cash compensation at full replacement cost where appropriate, to persons with legal rights or claims to land which are recognized or recognizable;

iv. Compensate economically displaced persons who are without legally recognizable claims to land for lost assets (such as crops, livestock, irrigation infrastructure and other improvements made to the land) other than land, at full replacement cost;
v. Provide additional targeted assistance (e.g., credit facilities, training, or job opportunities) and opportunities to improve or at least restore their income-earning capacity, production levels, and standards of living to economically displaced persons whose livelihoods or income levels are adversely affected;
vi. Provide transitional support to economically displaced persons, as necessary, based on a reasonable estimate of the time required to restore their income earning capacity, production levels, and standards of living.

7.5 Entitlements for compensations

As described above, the project will consider compensation to the following categories of people and loses project:

- Private landowners (with or without an established legal title to the land) whose land will be purchased to implement sub-projects;
- Private owners (with or without an established legal title to the property) whose assets such as residence, workshops, fences, warehouses, trees, standing crops, and other valuable assets need to be damaged or purchased;
- Project affected businesses (including formal and informal businesses) who experience temporary loss of income or asset as a result of restriction of access to land or assets during civil works;
- Project affected businesses (including formal and informal businesses) who experience temporary loss of income or asset as a result of purchase of land for implementation of sub-projects;
- Leaseholders (individual and enterprise) who have lease agreements with the Municipalities or other owners in existing and alternative alignments and sites.

Affected persons will be compensated for land purchased for permanent structures. Affected persons (i.e., owners, informal users and leaseholders) will also be compensated for damages and structures, standing crops, trees and other economic assets that are affected. If permanent relocation is involved, the affected persons will be relocated to new properties of equal quality identified and agreed by the Project and the PAPs. Affected persons will be compensated for transportation costs if relocation is involved.

Persons affected temporarily by construction activities will be compensated for any lost income, assets and damages. Table 4 below details the entitlement matrix that will be applicable.

Table 7-1: Entitlement for Project Affected Persons

Affected Assets	Type of Loss	Affected Party	Entitlement
Land	Permanent acquisition of land	Landowner (individual, family, community)	• In-kind compensation (land to land) for land-based displacement at a suitable location comparable to the previous land or better • Cash compensation for land determined by prevailing market rates where primary livelihood is not land based and where there is satisfactory demonstration of lack of adequate land or strong preference by the PAP. • Land replacement for community Lands or if unavailable, compensation be paid to the community with their full consultation and participation. • cash compensation covering all administrative, land registration and transfer fees
	Temporary occupation of land	Landowner (individual, family, community)	• Compensation (in cash or kind) for the period of occupation based on terms of occupancy as agreed among the parties. Compensation for loss of crops or assets on the land during the period of occupancy at full replacement cost.
Crops (food/cash crops and economic trees inclusive)	Destruction of or damage to standing crops	Owner or Farmer	• Cash compensation for standing crops counted at valuation date and based upon updated current Survey Department rates • Cost of replanting to the same maturity level, the estimated life and harvest from tree (fruit trees) • Disturbance allowance of 10% of cash compensation amount or at a rate determined by MLHCP. • To the extent feasible, allow for farmers to harvest crops before start of project interventions.
Structures		Owner	• Compensation at full replacement cost of structure • Cost of moving (e.g., persons/ goods in the structure under or belonging to owner)

Affected Assets	Type of Loss	Affected Party	Entitlement
	Destruction of immovable structures		• Disturbance allowance of 10% of cash compensation for full replacement or at a rate determined by the MLHCP
		Occupant	• Cost of renting similar structure • Cost of moving out to new place • Disturbance allowance of 10% of cost of renting similar structure or at a rate determined by the MLHCP
		Squatter	• Compensation for full replacement cost
	Relocation of movable structures	Owner	• Cost of moving affected structure to new site • Disturbance allowance of 10% of cost of moving similar structure or at a rate determined by the MLHCP
		Occupant	• Cost of moving occupants to new site • Disturbance allowance of 10% of cost of moving occupants to new site or at a rate determined by the MLHCP [NB: if owner is same as occupant, he/she will not be entitled to this disturbance allowance].
Livelihoods	Agriculture - destruction of economic or cash crop	Farmer	• Cash compensation for any temporary loss of income or livelihood incurred as a result of the project during the transition period (period required to re-establish farm elsewhere).
	Business	Business owner (may be distinct from owner of structure where business takes place)	• pay net profit losses to the owner for 3-6 months period

Affected Assets	Type of Loss	Affected Party	Entitlement
Loss of community properties/ resources	Loss of communal resources such livestock grazing grounds, farms (or involuntary restrictions to community assets)	User of such resources (can be individuals or communities) ,	• Assistance in identifying and accessing similar resources elsewhere with equal productive use. Plus, the cost of re-establishment of the resources • affected members will be given time to harvest their crops • Cash compensation of temporary loss of income incurred because of the Project during the period required to access similar resources elsewhere/period required to provide alternative livelihood assistance •
	Loss of community structures	Churches, health centres, schools, utilities, community centres	• The cost of purchasing or building a replacement structure, with an area, quality, and location similar to or better than those of the affected structure. • affected institution will be given time to salvage any assets
Cultural heritage resources (e.g., sacred site).	Avoid any impact on cultural heritage resources by finding alternative locations. If impact is unavoidable, ensure successful relocation or removal of cultural resource/ sacred site in accordance with Chance Find procedures prescribed under the ESMF.		

7.6 Cut-Off Date

Cut-off dates are essential in the process of drawing up lists to ensure that ineligible persons do not take the opportunity to claim eligibility. The establishment of a cut-off date is required to prevent opportunistic invasions/rush migration into the chosen land thereby posing a major risk to the sub-project. The cut-off date for this project shall be jointly determined by the Project and the Resettlement Committees, as appropriate, making anyone who makes a claim for loss of land or any assets after such a date ineligible for expropriation/ compensation.

The entitlement cut-off date refers to the time when the assessment of persons and their property in the identified project areas are carried out, i.e., the time when the MIC have identified the land sites they would need and when the socioeconomic study is taking place. Thereafter, no new cases of affected people will be considered. Unfinished structures would be identified and secured, and unused materials for individuals' constructions will be gathered at the site so that the cut–off survey can estimate PAPs' investments which should be compensated for in lieu of expenses (including labour) incurred until the cut–off date. Because the time period between the cut-off date and the time that actual productive investments (civil works, etc.) would start, (e.g., likely to be anytime period from six months on), special attention needs to be taken to secure the sites from rush and opportunistic invasion.

These measures could include close consultation with the recognized PAPs and signs that inform the public of intended use of site. Further monitoring of any violation of the cut-off date could be carried out by city and local councils as well as local authorities in the project locations and be reported to the Resettlement Committee. This could also be done both by the local PAPs representatives or the local community. The cut-off date is to be chosen in close consultation with MIC, and local leaders and the sub-project implementers. This should occur as soon as possible after the affected land is identified. This process must be in full compliance with the grievance redress mechanism in this RPF and the date must be communicated effectively to the potential PAPs and surrounding local communities.

8 VALUATION METHODS

8.1 Valuation Principles

Valuation of project affected land and assets shall consider the following:

- Applicable current schedules/rates for land values obtained from municipal councils, if available
- Applicable current schedules/rates for valuing structures, crops, and trees from the Local Council, if available
- Applicable current market prices
- Loss of future income or value

The calculation of unit value will be done keeping in consideration the current market rate so as to meet with the full replacement cost of the land and lost assets, etc. An experienced and registered independent local company shall be employed to do the valuation of land, structures, buildings, trees, crops, etc. The approach of the evaluator will consider the assessment of each type of land and assets by location. The valuation should be done when the census and Detailed Measurement Survey are conducted by a competent surveying firm who prepares the map of affected plots with demarcation of cut-off areas. The valuator will engage experts for respective areas who will undertake site visits for physical verification of each category of the losses. The expert team will also consider the reference of previous valuation if available and use latest release of market survey. Based on this methodology the unit rate will be determined. The unit rates may be based on the evaluation agency's assessment with their standard methods for calculating the sample assets.

8.2 Methods of valuing assets

The valuation of losses in physical assets will be carried out by assessing the market value of the assets, if known, and estimating the replacement cost. For this RPF, the valuator will adopt the full replacement cost method at the date of valuation. Replacement cost is simply calculated as the cost of replacing the lost assets plus any transaction costs associated with bringing the asset to pre-displacement value (e.g. cost of construction materials, price of buying and selling land, transportation costs and labour costs). Replacement cost will differ depending on the type of asset. The valuation and computation of the affected property will be based on the following:

- Land: Valuation will be based on market value of land of equal productive potential or use located in the vicinity of the affected land, plus the cost of preparing the land to levels similar to those of the affected land, plus the cost of any registration and transfer taxes.

- Crops and trees: Valuation will be based upon prevailing market values. May be necessary to adjust compensation to reflect that it can take several years after replanting before crops and trees begin to generate income.

- Structures: Valuation will be based upon full replacement cost. Replacement cost will be based upon sizes of structures, materials used and their prices, transportation costs of delivery of these materials and labour cost.

- Community assets/resource: These will be provided in-kind. The alternative community asset will be at least of the same standard as or equivalent or better standard than the affected asset. Examples of community compensation are rehabilitation of creation of market places; and reconstruction of community roads.

- Loss of business income: Compensation will be paid for the lost income and production during the transition period (the time between losing the business and full re-establishment of livelihood). This will be estimated based on the daily or monthly income of the affected parties.

- Inflation tendencies: As the period between valuation and compensation of assets is long, inflation allowances shall be considered when computing compensation costs.

- Sacred sites: In this policy, land acquisition for SL DTP Project must comply with the ESF.

For intangible losses that cannot easily be valued in monetary terms (i.e., access to employment opportunities, public services, social capital, etc.), the sub-projects should attempt to establish access to equivalent resources and earning opportunities that are acceptable to PAPs, and if this is not possible, should establish a fair compensation amount that considers the value of the loss from the time it occurred until the PAP can reasonably be expected to have replaced the lost income, asset, or access.

8.3 Forms of compensation payments for various eligible PAPs

The project may affect a variety of properties and assets which should all be screened for their value and their eligibility for due compensation. To settle compensation payments for the loss of assets, in accordance with ESS 5, compensation may be made in cash, in-kind and/or through assistance as agreed to between the MIC and the PAP. The type of compensation will be an individual choice. Affected individuals and households may opt for any one and/or more of the following forms:

Cash payments

Compensation calculated at replacement value and paid in Leones (using bank accounts or other e-payment accounts of affected persons). Rates will be adjusted for inflation.

Making compensation payment raises some issues regarding inflation, security and timing that must be considered. It is recommended that compensation be made through reputable local banks. This will ensure security of the PAPs money especially for those receiving large sums. Forms acknowledging receipt of the compensation packages shall be signed by each PAP. The RPF has provided an entitlement matrix that shows type of compensation for each category.

In-kind compensation

In-kind compensation is where the affected assets would be replaced with an asset of similar size, value, and quality. Compensation may include items such as land, houses/other buildings, building materials, seedlings, agricultural inputs and financial credits for equipment. Cash compensation for full replacement value will be paid for all of the impacted assets.

Resettlement and Economic Assistance

Resettlement assistance must include moving allowance, transportation and labour associated with resettlement as well as financial assistance for the people when access to land and income is restricted.

Rehabilitation Assistance

Rehabilitation assistance includes interventions that are undertaken to assist PAPs to attain their pre-project living standards and incomes to level, other than payments of the replacement value of acquired property. This may be in form of training for livelihoods, enrolment in public works and/or social cash transfer programs.

9 RESETTLEMENT PREPARATION AND IMPLEMENTATION PROCESSES AND INSTITUTIONAL ARRANGEMENTS

9.1 Resettlement Preparation and Implementation Process

The resettlement preparation process will begin with screening of subprojects/activities to determine if there is a need for the preparation of any resettlement instruments. The Project Safeguards Unit, led by the Social Safeguards Specialist will screen each sub project site for resettlement impacts and recommend for approval of the World Bank the need or otherwise for a resettlement instrument based on a site visit and preliminary consultation with relevant stakeholders using the checklist attached as Annex A. The MIC will provide overall oversight for the development and implementation of the RAP of sub-projects. It will supervise the establishment of a Resettlement Committee whose composition shall be determined taking into consideration the nature and type of impacts. The membership of the Resettlement Committee shall at all times include gender balance representatives of the respective Local Council and affected communities and PAPs. The steps in resettlement preparation and implementation outlined in Table 9-1.

Table 9-1: RAP Implementation Processes and Responsible Parties

Stage of RAP Implementation	Responsible Party
1. Identification of project site	MIC
2. Site Screening	Social Development Specialist at PCU/MIC
3. Determine the need for RAP/Livelihood Restoration Plan	MIC
4. Preparation of TOR for RAP	MIC
5. Procurement of consultant for RAP	MIC
6. Preparation of RAP	Consultant
7. RAP review	MIC
8. RAP clearance	World Bank
9. RAP disclosure	MIC
10. RAP implementation	Resettlement and Compensation Committee
11. Monitor RAP implementation	MIC
12. RAP completion audit	Consultant

As outlined in Table 8-1, the implementation of the RAP will be led by the Resettlement and Compensation Committee whose members will be drawn from various stakeholders as detailed in Table 9-2.

Table 9-2: Roles and Responsibilities of Resettlement and Compensation Committee Members

Institution	Role	Role in Implementation of the RAPs
MIC	• Government Implementing Agency • Management of project fiduciary activities • Consultation and coordination on policy issues • Management of project Environmental and Social activities.	• Responsible for implementing the resettlement program's due diligence process and the RPF. • Coordinate the implementation of resettlement activities in the selected institutions. • Guide the institutions on enforcing the mandated regulatory safeguards policies such as carrying out the sub-project RAPs by procuring the consultants • Monitor and supervise the implementation of this RPF/RAP during the implementation of the project • Liaise with the district and Ministry of Lands, Housing and Country Planning when need arises in ensuring the peaceful implementation of the process including handling of any grievances
Ministry of Lands, Housing and Country Planning	• Provide advisory services on land matters	• Responsible for managing and protecting the environment as well as land valuation and compensation
Ministry of Finance	• Donor coordination • Implementation support to agencies • Fiduciary responsibilities	• Have the financial responsibility for RAP implementation to pay cash compensation to PAPs. Upon receipt of the approval of the compensation data, the Ministry in collaboration with MIC will seek World Bank RVP approval to use project funds to pay compensation to PAPs.

Institution	Role	Role in Implementation of the RAPs
Environmental Protection Agency	• Provide environmental regulatory oversight and guidance on project implementation • Conduct environmental assessment	• EPA will be responsible for the overall supervision of the monitoring program and for screening and appraising the RAP as well as monitoring and evaluating the resettlement/rehabilitation process. • Provide technical guidance. • Issue EIA license • EPA approves the terms of reference for project assessments, reviews reports including the project brief, EIA and follow-up, monitoring reports. The Agency also helps the project proponents to establish a public consultation process.
Local Councils	• Represent community members at key decision taking platforms and or meetings. • Ensure compliance to safeguard instruments at council/city level. • Facilitate community mobilization initiatives to support the project	• Local councils have a shared responsibility for implementation of RAPs in their jurisdiction. • Lead on all activities related to the RAPs in the locality.
Chief/Headman	• Provision of land for implementation of sub-projects. • Assist in ensuring community ownership of the project. • Support community mobilization efforts • Involved in and facilitate the resolution of community conflicts and land disputes at community level.	• Participate in public disclosures, stakeholder engagements.

9.2 Physical Relocation and Transitional Assistance

Physical relocation may involve adjusting on the remaining area of an affected property, moving to a new plot selected by the affected household (self-relocation) or relocation to a plot in a resettlement site or housing unit developed by the project. The project will ensure that full compensation and other resettlement benefits and assistance are paid/granted to the displaced persons/households prior to their displacement. The payment of compensation will be made in accordance with the World Bank safeguard policy on Involuntary Resettlement.

9.3 Relocation of Businesses

The relocation of businesses will follow the same procedures as set out above. However, some businesses may be entitled to additional allowances such as for transport of goods and materials, restoration of utility services, re-fixing of fixtures and fittings, advertising etc. as well as allowances to be paid to the employees as specified in the Entitlement Matrix. Where possible, the project will encourage the owners or operators of affected industries and businesses to relocate to nearby areas.

9.4 Relocation of Infrastructure

The relocation of infrastructure facilities and public utility services will be undertaken by the agencies responsible for them (e.g. Sierra Leone Water Company (SALWACO) and Guma Valley Water Company (GVWC) in the case of water distribution lines). MIC will obtain the cost estimates required for relocating/shifting the affected facilities from these agencies, and then secure the necessary funds for moving or reconstructing the affected facilities. The funds will then be transferred to the respective agencies so that they can carry out the work. MIC will monitor the progress of the reconstruction and will coordinate closely with the relevant agencies to ensure that the works are completed as quickly as possible. A time frame will be agreed with the relevant service providers, and the same will be communicated to the public prior to the relocation of those utility services in order to avoid/minimize any inconveniences caused to them.

9.5 Relocation of Cultural Heritage sites and sites of Cultural and/or Religious Significance

There are no major cultural heritage sites expected to be relocated due to the project interventions. The project will consult the design teams to avoid any impacts on such social and religious sites. If unavoidable, measures that are required to be implemented for their relocation will be discussed and closely coordinated with the religious authorities and the communities that worship or use these sites. The project will also make available adequate funds required for their relocation such as for acquiring alternative land/sites, construction of shrines and graveyards, rituals and ceremonies to be performed during relocation etc. If additional civil works have to be undertaken to protect the sites, the project will consider alternative design options to avoid such structures/sites, and also include them as a part of the contract for construction works.

9.6 Tenure and Transfer of Titles

The transfer of tenure or titles to the households is an important part of the resettlement process. Those affected persons that have opted to move to resettlement sites or to housing units provided by the Project, MIC will coordinate with the local councils in which the resettlement sites are developed, in order to provide the resettled households with certificates of ownership. Further, in

the interest of enhancing women's asset ownership, options will be provided to the resettled households to have joint ownership or independent ownership of the land and house among the resettled household for women.

All the activities relating to ownership transfer, will take place in parallel to the activities related to payment of compensation.

10 PUBLIC CONSULTATION AND DISCLOSURE PLAN

10.1 Consultations held for RPF Preparation

The RPF, like any other safeguard instrument, is a public document, so its preparation was characterized by extensive stakeholder consultation and participation. Key project stakeholders consulted during the preparation of the RPF included Ministries, Departments and Agencies (MDAs), Local Councils, Private Organizations, CSOs, NGOs and potential beneficiary communities. Project Affected Persons will be identified during implementation when site specific project locations and designs are confirmed. The project stakeholder engagement plan will guide detailed consultations with PAPs during RAP preparations. Consultations were conducted in the Western Area of the country between 20th April and 6th May 2022. The meetings were held with government officials and representatives of key stakeholders to gauge their level of awareness and involvement with the project, concerns of project implementation, and to gather information on the role in the implementation of the project and the kind of capacity needs required to aid the performance of the anticipated roles in the implementation of the project.

10.2 Objectives of the Stakeholder Consultations

The consultation aimed at exploring and soliciting feedback on key elements of the RPF, share information about the SL DTP Project and identifying roles and responsibilities of different stakeholders in resettlement planning and implementation. During each of the stakeholder engagement consultation process, the project proponents presented the overall project objectives, components of proposed project interventions and area of influence, potential resettlement impacts and mitigation measures, GRM, community participation, and broader context of implementation arrangements and Monitoring and evaluation, in addition to other general features of the SL DTP Project. Community members reflected their concerns and provided constructive comments on the proposed project. The table below summarizes the issues discussed during the stakeholder engagement and consultation process. Annex B provides the full details and list of attendees at each of the respective communities. Men, women, the youth, aged etc. were engaged in the consultation process.

Table 10-1: Summary of Consultation outcomes

Issues	Views/opinions/questions	Response
Project location	Wanted to know about the project location	The project will improve digital efficiency and integration across GoSL agencies; and increase digital economy-related employment and industry revenues. Most project activities are of a technical nature to improve collaboration across various digital platforms in the country and organisation working on them, training of workers and deployment according to appropriate skills. Some of the activities will be within universities, schools and hospitals.
Stakeholder engagement and	Participants expressed the need for continuous and sustained engagement with	Community engagement will be a critical part of the project implementation process in terms of project updates and ensure that area of

Issues	Views/opinions/questions	Response
awareness raising	community stakeholders at all stages of the project implementation.	improvements are captured. The stakeholder engagement will be carried out continuously.
Employment	Local people in project communities should be given priority for available job opportunities	There shall be a deliberate efforts to hire most of the labour force from host communities and this will be done through local authorities.
Project monitoring	Local councils (municipal and district) should be involved in monitoring project implementation and would generally be useful in grievance management in project communities. Raise awareness about the project, resettlement and laws	Ensure that local government officials at the district level will support project implementation involving chief administrator, development and planning officer, environment officer etc.
Vulnerable groups (disable)	Severely affected vulnerable communities and individuals	Project will consider special assistance mechanism for the severely affected vulnerable communities and individuals. Disable students will also benefitted from the project.
Grievance Redress Mechanisms (GRM)	Is there any GRM under the project?	Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project level grievance redress mechanisms or the WB's Grievance Redress Service (GRS).
Ethical use of internet	Concerns were raised on the ethical use of internet as more people, including the youth and uneducated people, and more specifically school going children	The project preparation team will put together all ideas from stakeholders and will be examined against project objectives. Once all project details are decided, information about investments that will be funded will be duly communicated to the communities.
Risks and impacts	wanted to know about the risks and impacts	The project will promote the use of ICTs, the associated environmental risk is low and overall, the project is likely to have positive impact. The project will decrease the burden upon environment by reducing people movement (saving time and energy) and amount of paper used in offices. ICT equipment like server, computer, LAN may generate e-waste. This issue can be mitigated through proper e-waste disposal, regular training of ICT unit staff and proper record keeping of equipment purchased, reused and auctioned. They

Issues	Views/opinions/questions	Response
		will also be minor civil works as repair, renovation, trenches for laying of electrical/data cable. The activities may generate some construction related impacts (air, noise, waste problem), but these impacts are mitigated through the preparation and implementation of appropriate management plan. Site specific environmental and social screening/assessment along with the Environmental Social Management Plan (ESMP) will be prepared and implemented to mitigate the impacts.
Citizens and businesses	Will they be able to access more government services online?	They will be able to access more government services online, in a more reliable and faster manner. They will also be able to receive seamless service either on a self-service basis through digital channels or on a facilitated basis in their neighbourhood, instead of having to engage with fragmented and bureaucratic processes across multiple GOSL ministries, department, agencies, youth and women will benefit especially from increased digital skills training provided by the project. They will also benefit from greatly increased employment opportunities in the digital economy that will also provide him higher value-added and digital-oriented jobs.

10.3 Further Consultations

The SL DTP Project will continue to consult with the local councils, regulatory agencies, the beneficiary communities and other relevant stakeholders and concerned parties with interest, or likely to be affected by the project through the RAP preparation and implementation phases – if the preparation of RAP under the project is required. The project management structure also provides for continuous community and stakeholder engagement.

The objective of the consultations is to secure the participation of potential PAPs in the resettlement planning and implementation, particularly in the subproject design to minimize resettlement impacts, assessment of subproject resettlement impacts, determination of cut-of-date, compensation rates and eligibility for entitlements; timing of relocation; community development opportunities and initiatives; procedures for redressing grievances and resolving compensation related disputes; and mechanisms for monitoring and evaluation; and for implementing corrective actions.

Consultations should be in language understood by the PAPs. As much as possible, women should be consulted separately, if appropriate, to obtain their views about the subproject impacts on their lives and livelihoods. The consultation process should ensure sizeable participation of women, youth and groups at risk of exclusion, and also ensure prior distribution of project information in

a form that is accessible to community members, etc. Communities within the project areas should be informed on the project and likely project impacts and the extent of their involvement to ensure project success. Measures instituted to address negative project impacts should also be well communicated to the affected persons and community.

10.4 Disclosure Arrangements for RPFs and subsequent RAPs

The RPF and its associated instruments, such as the RAP, must be treated as public documents that are accessible to the public throughout the project life cycle. MIC shall be responsible for all disclosure of documents and must ensure that the RPF is published on the website of MIC and all other available channels of information disclosure.

The MIC shall also present all documents such as the RPF and related documents to the PAPs in the process of land acquisition, particularly vulnerable groups, and project impact on their property and their rights must be explained. Hard copies of the documentation shall be available in the affected local councils for dissemination to affected communities and persons. MIC must ensure that affected persons participate throughout the development and implementation of resettlement activities and in the land acquisition process. They shall be consulted by the affected local councils and the Resettlement Committee and invited to participate in public meetings held by local councils throughout the project life cycle. The affected persons must also be provided with information on the project, its impacts and the proposed mitigation strategies and livelihood restoration activities. The information made public and provided to each affected household must also specify the cut-off dates for each sub-project, eligibility criteria and entitlements, modalities of compensation, and grievance redress procedures. The affected parties will be provided with an opportunity of presenting their ideas and suggestions as inputs into the planning and implementation of the resettlement activities. The affected persons will also be represented in the Resettlement Committee and any other committee to be established, which will ensure their participation in the decision-making process in various stages of the RAP process including during preparation and implementation. After completion of RAP, the Project Management Unit (PMU) will commission a RAP audit and prepare a RAP completion report to determine whether the RAP is fully implemented.

11 IMPLEMENTATION ARRANGEMENTS, TECHNICAL SUPPORT AND CAPACITY ENHANCEMENT

11.1 Implementation Responsibility

The MIC will provide oversight and supervision in implementing the RPF. The project will recruit a Social Development specialist and other collaborating agencies will play a key role while incorporating proper social impacts mitigation measures in all subproject designs entailing land acquisition (renovation, rehabilitation, new buildings). The Social Development specialist will be responsible for supervision and coordination of all activities related to resettlement implementation for all the sub-projects. MIC will also ensure the active involvement of the respective local councils, project affected communities, and PAPs in the implementation of the RAP. A Resettlement and Compensation Committee shall also be established to oversee all resettlement and compensation issues related to the project.

11.2 Technical Support and Capacity Building

Compliance with World Bank's ESF will require capacity building of project implementing agencies at the national and provincial/district level. Capacity building on the ESS 5, ESS 10, this RPF and RAP, and other relevant ESF tools such as the GRM and SEP will be conducted during implementation for the implementing teams to be more effective.

11.3 Priority Tasks

Once sub-projects or activities and locations are determined in sufficient detail, preliminary screening of resettlement/ compensation related issues should be carried out by the MIC to confirm: (i) if land acquisition is involved, (ii) if implementation of sub-project activities will impact livelihoods and assets (structures, crops/economic plants and cultural heritage resources) of people; and (iii) if implementation of sub-project activities will cause physical or economic displacement of people. If any of these are triggered, resettlement instruments (RAPs) will be prepared for implementation prior to the taking of land and start of any civil works.

11.4 Budget and Funding Arrangements

The indicative cost of RPF and RAP implementation is estimated at **USD** 182,600 for five years. The RPF/RAP implementation budget is detailed below in Table 10-1:

Table 11-1:RPF Implementation Budget

Stakeholder Engagement Activities	Quantity	Times/ Years	Total Cost (USD)	Remarks
Community Sensitization meetings with Local communities and traditional authorities on the RPF	Lump sum	1	10,000	MIC and other national stakeholders, including CSOs, NGOs radio discussion, disclosure of RPF-report to stakeholders
Training and sensitization of Local & District Councils on RFP and WB ESS5	Lump sum	1	15,000	One training session per district involving local consultant
Publication of disclosure notice of the RAP(s) on website of relevant institutions, in at least two widely circulated national newspapers	2		1,000	Production and disclosure RAP documents, Stakeholder workshops
Awareness creation on local/community radios	Lump sum		10,000	Payment for airtime or jingles aired on community radio in each district
Preparation of RAP	Lumpsum		30,000	Local consultants
Internal Monitoring of RAP Implementation	Lump sum		30,000	Local consultants – allowances
External/Independent RAP Implementation monitoring and evaluation	Lump sum		50,000	International/local consultants' study/assessment per district.
Formation and training of community RAP grievance committees and GM awareness	Lump sum		20,000	International/local consultants per district involving training of beneficiaries and other stakeholders – GRM, disabled, gender and other vulnerable groups
Subtotal			**166,000**	
Contingency (10%)			16,600	
Total			**182,600**	

11.5 Arrangement for Funding Resettlement

If any project activity is deemed to cause displacement during implementation, MIC will seek approval from the World Bank to use project funds to pay compensation. **A** RVP memo will be

prepared at that point based on the approved RAP estimates to seek approval for use of project funds to pay compensation.

12 GRIEVANCE REDRESS MECHANISM (GRM)

The main objective of a Grievance Redress Mechanism (GRM) is to ensure and assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective, and lasting grievance resolution outcomes. It also builds trust and cooperation as an integral component of broader community/citizen engagement that collects feedback and facilitates corrective actions. The project will provide a GRM that will provide all direct and indirect beneficiaries, service providers and other stakeholders with the opportunity to raise their concerns and/or ask for information. Stakeholders will be informed of the GRM in place, as well as the measures put in place to protect them against any reprisal for its use. This will be done during sensitization activities and other interactions with stakeholders.

The GRM makes provision for complaints to be made through walk-ins to MIC offices, a toll-free hot-line managed by the Anti-Corruption Commission (ACC) all centre, and the web-based platform by email. The PCU will signed Memorandum of Understanding with Anti-Corruption. Once complaints are received at any level, they will be forwarded to the call or report centre(s) (with customized MIC/project website section) for sorting, to the GRM Committee or the appropriate bodies, persons or pillar leads for resolution and tracking of resolution process. Specifically, the following responsibilities shall be adhered to by the team;

i. Ensure that committees investigate grievances and propose appropriate measures to avoid orminimize adverse impacts of the interventions.
ii. Ensure that the processes comply with existing safeguard procedures and policies.
iii. Build the capacity of focal persons in effective community engagement, grievance handling,and negotiation and conflict resolution.
iv. Build trust and maintain rapport by providing affected persons and the wider public withadequate information on the project and its GRM procedures.
v. Follow up with GRM committee on the status of investigations and resolution of grievances,as well as communicating outcomes with complainants.
vi. Keep and maintain up to date complaints and grievances register
vii. Regularly provide a report on GRM results to the project proponents and the World Bank.

12.1 Objective of the GRM

The main objective of a Grievance Redress Mechanism (GRM) is to assist the implementing institutions to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. It is to help track project-related complaints including a feedback system for regular and timely feedback on actions taken to respond to complaints and to address and resolve any issues or problems connected to the proposed project from affected persons or community members promptly and in a manner that will be acceptable to all parties. The GRM is an integral part of this ESMF and helps to create avenues for receiving and responding to stakeholder concerns and complaints about issues related to the project. Specifically, it provides

a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community/ citizen engagement that facilitates corrective actions. Specifically, the GRM:

1. Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of projects;
2. Ensures that appropriate, timely and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
3. Verify that complainants are satisfied with redress action; and
4. Avoids the need to resort to judicial proceedings.

12.2 Proposed Grievance Redress Mechanism

Having multiple stakeholders and implementing agencies on board the project could lead to complaints, misunderstandings, conflicts and disputes. The project has a grievance redress mechanism that will provide all direct and indirect beneficiaries, service providers and other stakeholders the opportunity to raise their concerns and/or ask for information (see **Appendix 11-1** for Grievance Redress Forms). Stakeholders will be informed of the grievance redress mechanism in place, as well as the measures put in place to protect them against any reprisal for its use. This will be done during sensitization activities and other interactions with stakeholders. Grievances arising with the implementation of the project could typically include access and quality of services, issues about targeting for services and availability of facilities and resources. Grievances may also relate to expansion of infrastructural activities with some physical footprints in the later stages of project implementation.

Grievance Redress Mechanism Levels

The GRM levels is presented in **Table 11-1** and further illustrated in **Figure 7-1**.

Table 12-1: Grievance Redress Mechanism Levels

Level One	1. Receive grievance 2. Acknowledge grievance 3. Register/Log 4. Screen 5. Investigate 6. Resolve 7. Provide feedback
Level Two	Grievance Redress Committee
Level Three	Mediation
Level Four	Court

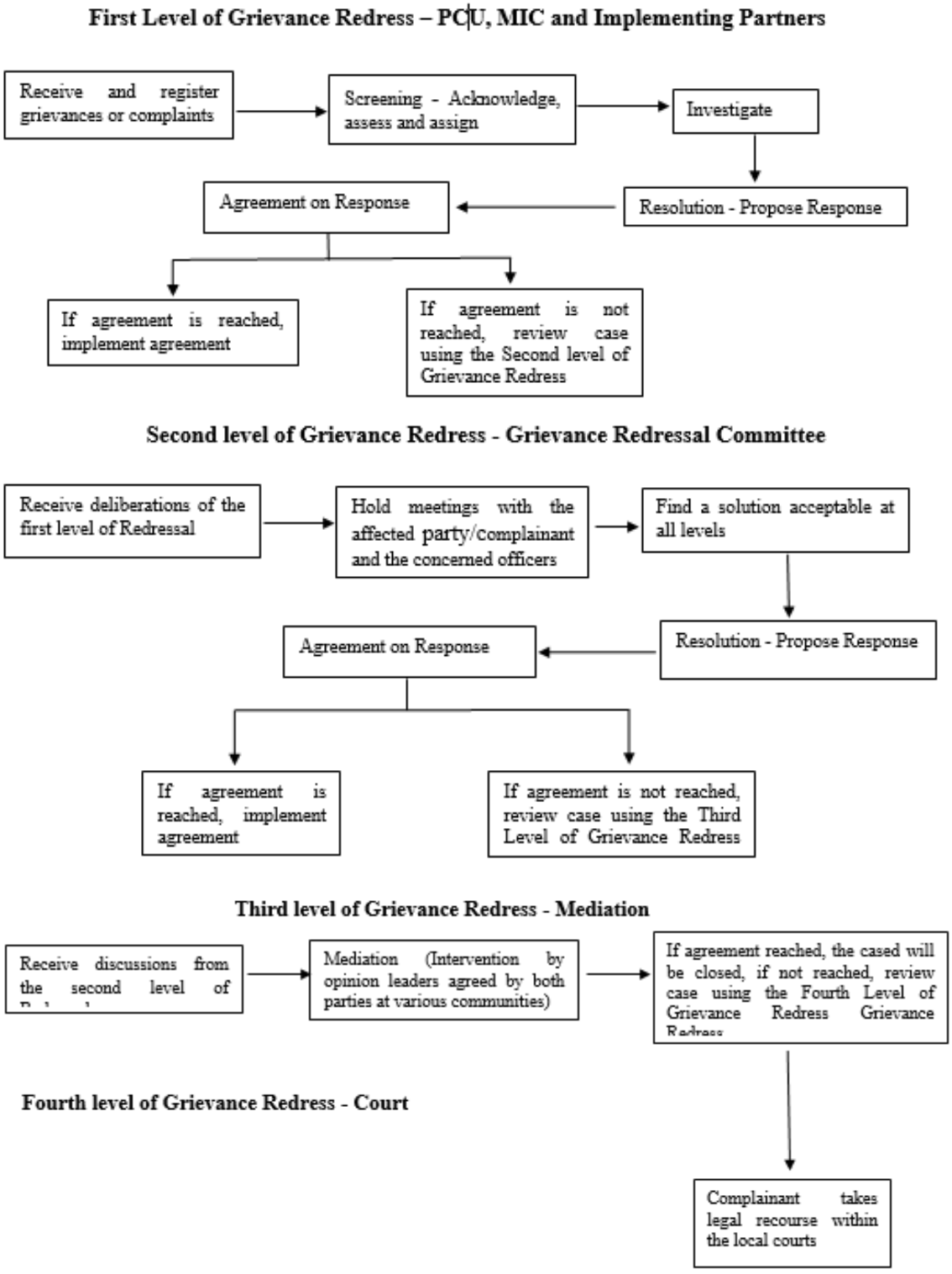


Figure 12-1: Proposed GRM Structure

First Level of Grievance Redress

The project institutions within which project activities are carried out are the first level of grievance redress. Each institution (MDA, training institutions, regional offices) where project activities are undertaken will use existing grievance mechanisms to review and address grievances. The first level of grievances will be handled at the PCU level GRM that is composed of representatives from the implementing agency MIC and the implementing partners represented in the PSC.

The full contact details of the grievance committees will be disclosed publicly on the website of the GRM member ministries and agencies. The same information should be displayed on the notice boards of the agencies and institutions along with the complainant box that should be placed in a visible location within the premises of the institutions, ministries and agencies. Grievances from the project dedicated complainant box will be collected and reviewed by the institution's grievance committee on a weekly basis.

Grievances can be received in person, verbally via phone, in writing or via e mail, fax, text message or any other media. Grievances submitted anonymously could be submitted through the complainant box. All grievances will be acknowledged by telephone or in writing by the grievance body of the institution within 48 hours of receipt and the complainant informed of the approximate timeline for addressing the complaint, if it can't be addressed immediately.

The grievance body will work to ensure the speedy resolution of the grievance. If the complaint cannot be resolved at this level it is taken to the next level.

The point of receipt of complaints is listed hereunder:

Register/Log Grievance: After receiving and recording the grievance, it will be accepted and registered for review.

Screen: The complaint will be forwarded to the grievance structure that is responsible for investigating the claim and liaising with the aggrieved in order to come to an acceptable resolution. Meetings with the grievant/complainant will be held, if necessary, to resolve the matter.

Investigate: The investigation by the grievance committee will include, but not limited to, meetings with the grievant/complainant, site visits, meetings/interviews with project staff and collection of relevant documentation and other forms of evidence.

Resolution: The resolution at the first tier should normally be completed within 15 working days of receipt of the grievance and notified to the concerned party. If the grievance is not resolved within this period, it can be referred to the next level of the Grievance Redressal system. However, once it is determined that progress is being made towards a resolution, the grievance will be retained at this first level. The complainant will be informed of this decision and an estimated time for the resolution of the matter will be given either verbally or in writing. If the issue cannot be resolved within 25 working days, it will be transferred to the next level.

Once a resolution has been agreed and accepted, the complainant's acceptance will be obtained. If the proposed resolution is not accepted the grievance will be escalated to level 2.

Second level of Grievance Redress

A Grievance Redressal Committee (GRC) will be formed at the PCU/MIC comprised of key implementing entities that will consist of members of their respective Project Steering Committees. The GRC will be called into place when a first-tier resolution is not found, but it could also meet on a quarterly basis to evaluate the performance of the project level GRM. From this perspective it is a standing body.

This committee will be chaired by the GRC representative of MIC in the Project Steering Committee. The implementing partner ministries/agencies represented in PSC will assign representatives to the GRC.

The functions of the GRC are as follows:

1. Provide relief and support to the affected persons in a timely manner
2. Prioritize grievances and resolve them at the earliest reasonable time
3. Provide information to PCU on serious cases at the earliest plausible time
4. Coordinate the process of the Affected Persons getting proper and timely information on the solution worked out for his/her grievance
5. Study the normally occurring grievances and advise the PM/PCU as to their scale and scope.

The project coordinator at the PCU will coordinate the convening of the meetings of the GRC. He/ She is also responsible for briefing the GRC on the deliberations of the first level of Redressal. The GRC will hold the necessary meetings with the affected party/complainant and the concerned officers and attempt to find a solution acceptable at all levels.

GRC will record the minutes of the meeting. The decisions of the GRC will be communicated to the complainant formally and if she/he accepts the resolutions, the complainant's acceptance will be obtained.

If the complainant does not accept the solution offered by the GRC, then the complaint is passed on to the next level/or the complainant can activate the next level. It is expected that the complaint will be resolved at this level within 30 working days of receipt of the original complaint. However, if both parties agree that meaningful progress is being made to resolve the matter may be retained at this level for a maximum of 60 working days.

Third Level of Grievance Redress

Failure to resolve the complaint at the 2nd level will require a mediation by a group or an individual mediator agreed to by both parties. The officer in-charge of grievance redress at the PCU will trigger the resolution process at this level. It is expected that the complaint is resolved within Ten (10) working days upon the receipt of complaint. The decision rendered in the mediation shall constitute final resolution of the dispute at this level.

Fourth Level of Grievance Redress

If the affected party/complainant does not agree with the resolution at the 3rd level, or there is a time delay of more than 60 working days in resolving the issue, the complainant can opt to consider

taking it to the fourth level. This level involves the complainant taking legal recourse within the local courts.

12.3 SEA/H Related Grievance Redress Mechanism

When Sexual Exploitation, Abuse and Harassment (SEA/H) related complaint is received at the first or second tier of GRM, the complaint should be kept confidential by the person/persons receiving the complaint. The complaint should be reported to the relevant committee and immediate actions should be taken that is consistent with the wishes and choices, rights and dignity of the complainant. The complainant should be given information in simple and clear terms on the steps for filing complaints and the possible outcomes, the timelines and the types of supports available to be able to make informed decision.

For SEA/H cases, it is important to ensure that access to the complaints processes is as easy and as safe as possible for the complainant survivor. The recording of incidence should be limited to the nature of complaint put exactly in the words of the complainant, the age of the survivor and if to the best of their knowledge, the perpetrator was associated with the project. The complainant should decide on whether they would like to be referred to the grievance committee and the complainant should give consent to share basic monitoring data.

Safety & Well-Being: The safety of the survivor shall be ensured at all times including during reporting, investigation, and the provision of victim assistance. Those involved in the management of complaints will need to consider potential dangers and risks to all parties (including the survivor, the complainant if different the subject of the complaint, and the organizations involved), and streamline ways to prevent additional harm in all the complaint handling process.

The survivor is never to blame for reporting an act of SEA/H and should never be made feel investigated. On the contrary, it is important that she/he feels that her story is heard, believed and valued. The actions and responses of the complaint mechanism will be guided by respect for the choices, needs, rights, and the dignity of the survivor.

Confidentiality: The confidentiality of complainants, survivors, and other relevant parties must be respected at all times. All SEA/H-related information must be kept confidential, identities must be protected, and the personal information on survivors should be collected and shared only with the informed consent of the person concerned and on a strict need-to-know basis.

Survivor-Cantered Approach: All prevention and responses action will need to balance the respect for due process with the requirements of a survivor-centred approach in which the survivor's choices, needs, safety, and wellbeing remain at the centre in all matters and procedures. As such, all actions taken should be guided by respect for choices, needs, rights and dignity of the survivor, whose agency and resilience must be fostered through the complaint process.

Accessibility and non-discrimination: The mechanism must be accessible to all potential complainants and sufficient information must be given on how to access them, making the complaints process accessible to the largest possible number of people. This includes identifying and instituting various entry points that are both gender and context sensitive. To facilitate

incidents reporting and avoid stigmatization, reports from third parties (witnesses, people suspicious or aware of an incident, etc.) must also follow accountability protocols.

12.4 Building Grievance Redress Mechanism Awareness

The PCU Environmental and Social Safeguards Specialist will initially brief all staff of the project office, the Project Steering Committee (PSC), consultants and contractors on the Grievance Redressal Mechanism and SEA/H complaints mechanism of the Project and explain to them the procedures and formats to be used including the reporting procedures.

The project Environmental and Social Safeguards Specialist will brief all project stakeholders on the Grievance Redressal Mechanism of the Project and explain the procedures and formats to be used including the reporting procedures. Awareness campaigns would be conducted targeting project stakeholders to inform them of the availability of the mechanism. The GRM will also be published on the MIC website and those of the implementing partners and the project website and other social media platforms if any. Project/ subproject site boards will be erected on the sites of sub-projects indicating the existence of the mechanism and phone number(s), email(s) and address(es) for further information. The GRM will be translated into local languages if needed.

12.5 Recommended Grievance Redress Time Frame

Table 11-2 presents the recommended time frames for addressing grievance or disputes related to resettlement and compensation. It is anticipated that resettlement/compensation disputes could be resolved at the community or regional levels.

Table 12-2: Proposed GRM Time Frame

Step	Process	Time frame
1	Receive and register grievance	within 24 hours
2	Acknowledge	within 24 hours
3	Assess grievance	Within 2 Days
4	Assign responsibility	Within 2 Days
5	Development of response	within 21 Days
6	Implementation of response if agreement is reached	within 21 Days
7	Close grievance	within 30 Days
8	Initiate grievance review process if no agreement is reached at the first instance	within 30 Days
9	Implement review recommendation and close grievance	within 30 Days
10	Mediation	Within 10 Days
11	Grievance taken to court by complainant	As applicable

The following indicators could be used for monitoring purposes:

- Number of active project complaints and appeals recorded and reported in each institution;
- Number of grievance redressed claims settled within the specified period;
- Number of unresolved complaints or disputes during the monitoring period; and

- Comments received by government authorities, women & youth, family, community leaders and other parties and passed to the Project.

12.6 Grievance Documentation and Reporting

Complaints and concerns gathered via different channels are stored in a centralized electronic logbook and made directly accessible to authorities in charge of the resolution. Reports can also be generated on the platform for dissemination.

Quarterly and annual progress reports shall include a GRM section which provides 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 lower level, raised to higher levels
- Satisfaction with the action taken
- Any issues faced with the procedures/staffing or use
- Factors that may be affecting the use of the GRM/beneficiary feedback system
- Any corrective measures adopted

12.7 Oversight and review

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.

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.

12.8 Anticipated Grievances

Grievances and disputes that may arise during implementation of a resettlement/ compensation program may be related to the following issues among others:

- Siting of the subproject interventions;
- Mistakes in inventorying or valuing properties;
- Disagreement on property boundaries, either between the affected person and the expropriation agency or between two neighbours;
- Disputed ownership of a given asset (two or more affected people claim that the affected asset is theirs);
- Disagreement on asset valuation methods and compensation amounts in cash or in-kind;

- Successions, divorces, and other family issues resulting in disputed ownership or disputed shares between inheritors or family members including couples as to who should be given the cash compensation;
- Disagreement with the computation of the resettlement or livelihood assistance or transportation cost;
- Claims by people who relocated on their own after receiving notification about the project and the likelihood of impact on their activities; and
- Delays in resolving complaints of PAPs.

13 MONITORING, EVALUATION AND REPORTING

Supervision and monitoring of resettlement issues would be carried out systematically with the supervision and monitoring of the social issues as identified in this RPF. The monitoring of these issues will be incorporated into the performance evaluation of the overall project.

13.1 Purpose of Resettlement M&E

Monitoring and evaluation are key components of the RPF. The general objectives are:

- Verifying that the principles and procedures of the RPF are followed during development and implementation of the RAP;
- Ensuring that stakeholders are meaningfully engaged during preparation and implementation of the RAP;
- Verifying that the procedures of the RAP are being implemented as intended and required;
- Determining whether RAP implementation is proceeding as per schedule and that timeliness are being met;
- Ensuring that the standards of living and livelihoods affected people and households are actually being restored or improved, including whether compensation and assistance are sufficient to achieve this;
- Verifying solutions are sufficient to overcome the issues they were designed to address.

In case a RAP is prepared and implemented, internal monitoring is required in order to ensure transparency and full compliance. External monitoring is required only when the project has significant resettlement impacts.

13.2 Arrangements for Monitoring and Evaluation

Arrangements for monitoring would fit with the overall monitoring plan of the SL DTP Project. MIC will undertake regular field visits to project sites, maintain a dialogue with affected persons and ensure that consultations are conducted regularly and effectively. The monitoring will include: (i) the progress reports, status of the RAP implementation, information on location and number of people affected, compensation amounts paid by item, and assistance provided to PAPs; (ii) implementation and effectiveness of the livelihood restoration plan; (iii) disclosure of monitoring results to PAPs and other stakeholders; (iv) the level of consultations conducted with PAPs and other stakeholders to address gaps in resettlement plan implementation and to identify necessary measures to mitigate, avoid or minimise adverse impacts arising from project implementation; (v) status of land acquisition and payments on land compensation, (vi) selection and distribution of replacement land areas (if any); and (vii) follow up of and resolution of grievances. Monitoring will also include reviews of census information, interviews of affected people and households, sample surveys, and periodic community meetings.

The report of monitoring results will be prepared by MIC and submitted to the World Bank on a quarterly basis to review the progress of the safeguards implementation of resettlement activities and any other compliance issues and corrective actions adopted. The reports will closely follow the involuntary resettlement monitoring indicators agreed at the time of resettlement plan approval.

13.3 Annual Performance Audit

An annual performance audit would be carried out once a year, by independent consultants to be hired by MIC, in order to ensure that RAPs are being implemented in compliance with the Resettlement Policy Framework, and that compensation payments have been carried out satisfactorily. The audit report would be submitted to the MIC and to the World Bank for clearance.

13.4 Completion Audit

As part of the World Bank requirements, if the sub-projects have significant involuntary resettlement impacts, an external completion audit of the RAPs must be conducted. The completion audit will evaluate whether the efforts to restore the livelihoods and living standards of the affected population have been successful. The audit measures whether the livelihoods and living standards of the affected population meet or exceed those enjoyed prior to displacement, and if that is not the case, what additional measures, if any, are needed to help improve, or at least restore, livelihoods and living standards. The audit also verifies that all physical inputs committed to in the resettlement plan have been delivered, and all agreed services have been provided.[3] MIC, in consultation with the World Bank, will engage a consultant or auditor to carry out the completion audit. The completion audit is to be undertaken after implementation of the RAPs (i.e., compensation programs).

12.5. Updating

If during project implementation or in case of changes in project design or alignment, additional adverse social impacts are identified and/or additional affected households are found, they are entitled to receive project entitlements as provided for in this RPF and associated legal instruments.

Updating RAP information and costs should be undertaken if the implementation will be delayed by twelve months, there is a significant scope change to the project and/or there is material evidence of inflation significant enough to influence the increase of the resettlement budget.

In the case that are variations made to the land acquisition and resettlement related legislation of the GoSL or of the World Bank, a review of, and amendments to the RAP may also be triggered.

[3] https://documents1.worldbank.org/curated/en/294331530217033360/ESF-Guidance-Note-5-Land-Acquisition-Restrictions-on-Land-Use-and-Involuntary-Resettlement-English.pdf

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15 APPENDICES

15.1 Appendix 1.1: Screening Checklist for Involuntary Resettlement

A. PROJECT NAME

1.	Project Location (Province, District, Town)	
2.	Safeguard officer filling Form	
3.	Date of Screening	

B. DESCRIPTION OF ACTIVITY

1.	Type of Activity (including objectives and outputs)	
2.	Land area to be taken by project activity, in hectares (include location coordinates)	
3.	Any existing property to be affected, and by how much (total, partial demolition etc.)	
4.	Any plans for construction, movement of earth, changes in land cover	
5.	Date of commencement and expected completion	

	date and estimated cost	

C. PRELIMINARY ENVIRONMENTAL INFORMATION

		YES	NO	COMMENT
1.	Is there adjacent/nearby critical natural habitat?			
2.	Are there activities at the project site?			
3.	What is the current land use			
4.	Will the proposed activities have any impact on any ecosystem services, biodiversity issues or natural habitats?			
5.	Will there be restrictions or loss of access to community facilities or resources?			
6.	Will there be restrictions or loss of access to community facilities or resources?			

D. PRELIMINARY SOCIAL INFORMATION

		YES	NO	COMMENT
1.	Has there been litigation or complaints of any environmental nature directed against the proponent or subproject?			
2.	Will the subproject require the acquisition of land?			
3.	What is the status of the land holding required by the project (customary, lease, community lands, etc.)?			
4.	Is there evidence of land tenure status of landowners and/or occupants (affidavit, other documentation)?			
5.	Are there outstanding land disputes?			
6.	Has there been proper consultation with stakeholders?			
7.	Is there a grievance process identified for PAPs and is this			

	easily accessible to these groups/individuals?			
8.	Will there be any changes to livelihoods?			
9.	What are the main issues associated with community benefits?			
10.	Will any restoration or compensation be required with Affected persons			

E. IMPACT IDENTIFICATION AND CLASSIFICATION

		Choose L, M or H	**COMMENT**
1.	Livelihood	LOW (No livelihoods affected, short project duration and persons may revert to business activities immediately	
		MEDIUM (Livelihoods affected, and persons may require some minimal assistance)	
		HIGH (Livelihoods affected, and compensation payments required	
2.	Land tenure	LOW (No conflicts, disagreements around use of land)	
		MEDIUM (Process of land regularization and rights to natural resources being worked out with clear communication and grievance process in place)	
		HIGH (Land conflicts historically unresolved, community/ persons being evicted, settlers losing rights and no transparency or grievance redress available)	

F. SUMMARY OF SITE SENSITIVITY

		Tick appropriately		**Comments**
	[A]	HIGH		
	[B]	MEDIUM		

	[C]	LOW		

G. IMPACT MITIGATION

	Impact identified	
	Mitigation options	

H. DETERMINATION OF ENVIRONMENTAL CATEGORY BASED ON SCREENING

			Tick appropriately	COMMENT
	[A]	REQUIRES RAP		
	[B]	REQUIRES PREPARATION OF ADDITIONAL E&S INFORMATION TO SUPPORT RPF		
	[C]	DOES NOT REQUIRE FURTHER ENVIRONMENTAL AND SOCIAL DUE DILIGENCE – REFER TO RPF		
	PREPARED BY: DATE:	…….. ……..		

15.2 Appendix 1.2: TERMS OF REFERENCE FOR RESETTLEMENT ACTION PLAN (RAP)

This template is extracted from the ESS5- Annex 1: Involuntary Resettlement Instruments.

The cope of requirements and level of detail of the resettlement plan vary with the magnitude and complexity of resettlement. This plan is based on up-to-date and reliable information about:

(i) The proposed resettlement and its impacts on the displaced persons and other adversely affected groups,
(ii) Appropriate and feasible mitigation measures, and
(iii) The legal issues involved in resettlement. The resettlement plan covers the elements below, as relevant.

Minimum elements of a resettlement plan

Description of the project: General description of the project and identification of the project affected areas.

Potential Impacts: Identification of the:

a) The project components or activities that require resettlement or restriction of access; explaining why the selected land must be impacted for use within the timeframe of the project;
b) the zone of impact of components or activities;
c) the scope and scale of impacts on structures and other fixed assets
d) alternatives considered to avoid or minimize resettlement or restricted access; and
e) the mechanisms established to minimize resettlement, displacement, and restricted access, to the extent possible, during project implementation.

Objectives: The main objectives of the project activities or components that may require a resettlement program as these apply to the Project should be described in relation to the project.

Census and socio-economic studies: This section summarizes the findings of socio-economic studies to be conducted with the involvement of potentially affected people if a RAP were to be developed. These generally include the results of a census of the PAPs covering:

- Current occupants of the affected area as a basis for design of the RAP and to clearly set a cut-off date, the purpose of which is to exclude subsequent inflows of people into the area who may seek compensation and resettlement assistance;

- Standard characteristics of displaced households, including a description of production systems, labor, and household organization; and baseline information on livelihoods (including, as relevant, production levels and income derived from both formal and informal economic activities) and standards of living (including health status) of the potentially displaced population;

- Magnitude of the expected loss, total or partial, of assets, and the extent of displacement, physical or economic;

- Information on vulnerable groups or persons, for whom special provisions may have to be made; and

- Provisions to update information on the displaced people's livelihoods and standards of living at regular intervals so that the latest information is available at the time of their displacement, and to measure impacts (or changes) in their livelihood and living conditions.

There may be other studies that the RFP can draw upon, such as those describing the following, as needed:

- Land tenure, property, and transfer systems, including an inventory of common property natural resources from which people derive their livelihoods and sustenance, non-title-based usufruct systems (including fishing, grazing, or use of forest areas) governed by local recognized land allocation mechanisms, and any issues raised by different tenure systems in the sub project area;

- Patterns of social interaction in the affected communities, including social support systems, and how they will be affected by the sub-project;

- Public infrastructure and social services that will be affected; and

- Social and cultural characteristics of displaced communities, and their host communities, including a description of formal and informal institutions. These may cover, for example, community organizations; cultural, social or ritual groups; and non-governmental organizations (NGOs) that may be relevant to the consultation strategy and to designing and implementing the resettlement activities.

Legal Framework: The analysis of the legal and institutional framework in the country should cover the following:

- Scope of existing land and property laws governing resources, including state-owned lands under eminent domain and the nature of compensation associated with valuation methodologies; land market; mode and timing of payments, etc.;
- Applicable legal and administrative procedures, including a description of the grievance procedures and remedies available to PAPs in the judicial process and the execution of these procedures, including any available alternative dispute resolution mechanisms that may be relevant to implementation of the resettlement for the sub-project;
- Relevant laws (including customary and traditional law) governing land tenure, valuation of assets and losses, compensation, and natural resource usage rights, customary personal law; communal laws, etc., related to displacement and resettlement, and environmental laws and social welfare legislation;

- Laws and regulations relating to the agencies responsible for implementing resettlement activities in the sub-projects;
- Gaps, if any, between local laws covering resettlement and the Bank's resettlement policy, and the mechanisms for addressing such gaps; and
- Legal steps necessary to ensure the effective implementation of RAP activities in the sub-projects, including, as appropriate, a process for recognizing claims to legal rights to land, including claims that derive from customary and traditional usage, etc., and which are specific to the sub-projects.

The institutional framework governing implementation of a RAP, when needed, would generally cover:

- Agencies and offices responsible for resettlement activities and civil society groups like NGOs that may have a role in implementation;
- Institutional capacities of these agencies, offices, and civil society groups in carrying out implementation, monitoring, and evaluation; and
- Activities for enhancing the institutional capacities of agencies, offices, and civil society groups, especially in the consultation and monitoring processes.

Eligibility and entitlements: Definition of potentially displaced persons or PAPS and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cut-off dates

Valuation of and compensation for losses: The methodology to be used in the RAP for valuing losses, or damages, for the purpose of determining their replacement costs; and a description of the proposed types and levels of compensation consistent with national and local laws and measures, as necessary, to ensure that these are based on acceptable values (e.g. market rates).

Resettlement Measures: A description of the compensation and other resettlement measures that will assist each category of eligible PAPs to achieve the resettlement objectives. Aside from compensation, these measures should include programs for livelihood restoration, grievance mechanisms, consultations, and disclosure of information.

Site selection, site preparation, and relocation: If a resettlement site is an option, this section describes the alternative relocation sites as follows:

- Institutional and technical arrangements for identifying and preparing relocation sites, whether rural or urban, for which a combination of productive potential, locational advantages, and other factors is at least comparable to the advantages of the old sites, with an estimate of the time needed to acquire and transfer land and ancillary resources;
- Any measures necessary to prevent land speculation or influx of eligible persons at the selected sites;
- Procedures for physical relocation under the project, including timetables for site preparation and transfer; and
- Legal arrangements for recognizing (or regularizing) tenure and transferring titles to resettlers.

Housing, infrastructure, and social services: Plans to provide (or to finance resettlers provision of) housing, infrastructure (e.g. water supply, feeder roads), and social services to host populations; and any other necessary site development, engineering, and architectural designs for these facilities should be described.

Environmental protection and management. A description of the boundaries of the relocation area is needed. This description includes an assessment of the environmental impacts of the proposed resettlement and measures to mitigate and manage these impacts (coordinated as appropriate with the environmental assessment of the main investment requiring the resettlement).

Community Participation: Consistent with the World Bank's policy on consultation and disclosure, a strategy for consultation with, and participation of, PAPs and host communities, should include:

- Description of the strategy for consultation with and participation of PAPs and hosts in the design and implementation of resettlement activities;
- Summary of the consultations and how PAPs' views were taken into account in preparing the resettlement plan; and
- Review of resettlement alternatives presented and the choices made by PAPs regarding options available to them, including choices related to forms of compensation and resettlement assistance, to relocating as individual families or as parts of pre-existing communities or kinship groups, to sustaining existing patterns of group organization, and to retaining access to cultural property (e.g. places of worship, pilgrimage centers, cemeteries); and
- Arrangements on how PAPs can communicate their concerns to project authorities throughout planning and implementation, and measures to ensure that vulnerable groups (including indigenous peoples, ethnic minorities, landless, children and youth, and women) are adequately represented.

The consultations should cover measures to mitigate the impact of resettlement on any host communities, including:

- Consultations with host communities and local governments;
- Arrangements for prompt tendering of any payment due the hosts for land or other assets provided to PAPs;
- Conflict resolution involving PAPs and host communities; and
- Additional services (e.g. education, water, health, and production services) in host communities to make them at least comparable to services available to PAPs.

Grievance procedures: The RFP should provide describe the mechanisms for ensuring that an affordable and accessible procedure is in place for third-party settlement of disputes arising from resettlement. These mechanisms should take into account the availability of judicial and legal services, as well as community and traditional dispute settlement mechanisms.

Implementation responsibilities: The RFP should be clear about the implementation responsibilities of various agencies, offices, and local representatives. These responsibilities should cover: (i) delivery of compensation and rehabilitation measures and provision of services; (ii) appropriate coordination between agencies and jurisdictions involved in implementation; and (iii) measures (including technical assistance) needed to strengthen the implementing agencies' capacities of responsibility for managing facilities and services provided under the project and for transferring to PAPs some responsibilities related to RAP components (e.g. community-based livelihood restoration; participatory monitoring; etc.).

Implementation Schedule: An implementation schedule covering all resettlement related activities from preparation, implementation, and monitoring and evaluation should be included. These should identify the target dates for delivery of benefits to PAPs and hosts and a clearly defined closing date. The schedule should indicate how these activities are linked to the implementation of the overall project.

Costs and budget: The specific activities or sub-projects should provide detailed (itemized) cost estimates, including allowances for inflation, population growth, and other contingencies; timetable for expenditures; sources of funds; and arrangements for timely flow of funds. These should include other fiduciary arrangements consistent with the rest of the project governing financial management and procurement.

Monitoring and evaluation: Arrangements for monitoring and evaluation of RAP activities by the implementing agency, and the independent monitoring of these activities, should be included in the RAP section on monitoring and evaluation. The final evaluation should be done by an independent monitor or agency to measure RAP outcomes and impacts on PAPs' livelihood and living conditions. The World Bank has examples of performance monitoring indicators to measure inputs, outputs, and outcomes for RAP activities; involvement of PAPS in the monitoring process; evaluation of the impact of RAP activities over a reasonable period after resettlement and compensation and using the results of RAP impact monitoring to guide subsequent implementation.

Arrangements for adaptive management. The plan should include provisions for adapting resettlement implementation in response to unanticipated obstacles to achieving satisfactory resettlement outcomes.

15.3 Appendix 1.3: GRIEVANCE INFORMATION FORM

Grievance Information Form

Date/Time received:	**Date: (dd-mm-yyyy)** **Grievance ID #:** **Time:** **□ am** **□ pm**	
Name of Complainant:		□ You can use my name, but do not use it in public. □ You can use my name when talking about this concern in public. □ You cannot use my name at all.
Company (if applicable)		□ You can use my company name, but do not use it in public. □ You can use my company name when talking about this concern in public. □ You cannot use my company name at all
Contact Information:	Phone: Email address: Address: Location: (Kindly indicate the preferred language and method of communication)	
Status of Occurrence	□ One-time incident/complaint □ Happened more than once (indicate how many times): _____ □ Ongoing (a currently existing problem)	

_____ _____

Grievant/Complainant Signature (if applicable) **Date (dd-mm-yyyy)**

_____ _____

Project personnel Signature (to confirm receipt only) **Date (dd-mm-yyyy)**

For PCU use only:

Grievance No: _____

Grievance Category:

□ Problems during material transport

□ Blocked road access

□ Dust

□ Noise

□ Smell

□ Problem with project staff

□ Other (specify): _____

Grievance Owner/ Department: _____ **Grievant/Complainant Signature (if applicable): _____**

15.4 Appendix 1.4 - Grievance Acknowledgement Form (GAF)

The project acknowledges receipt of your complaint and will contact you within 10 working days.

Grievance ID #: **Date of grievance/complaint:** **(dd/mm/yyyy)**	
Name of Grievant/Complainant:	
Complainant's Address and Contact Information:	
Summary of Grievance/Complaint: **(Who, what, when, where)**	
Name of Project Staff Acknowledging Grievance:	
Signature:	
Date: (dd/mm/yyyy)	

15.5 Appendix 1.5 - Grievance Redressal Registration Monitoring Sheet

No.	Grievance ID #.	Name of Grievant/ Complainant	Date Received	Grievance Description	Name of Grievant Owner	Action(s) to be taken	Responsible Unit	Due Date	Result(s) of Intervention	Closing Date of Complaint

15.6 Appendix 1.6 - Disclosure/Release Form

Grievance ID #:	
Name of Grievant/Complainant:	
Date of Complaint:	
Summary of Complaint:	
Summary of Resolution:	
Resolved at:	**□ First Level □ Second Level □ Third Level**
Date of grievance resolution (dd/mm/yyyy):	

_____ _____

Grievant/Complainant Signature (if applicable) **Date (dd-mm-yyyy)**

_____ _____

Project personnel Signature (to confirm receipt only) **Date (dd-mm-yyyy)**

15.7 Appendix 1.7: Sample of Notes from Consultations Conducted with Stakeholders

Name and details	Institution	Remarks
Alphajor Cham Director of planning, policy and project management Jobo Samba, Director GIS Alfred Bockarie, Chief Technical Advisor	Ministry of Lands, Housing and Country Planning (MLHCP)	• Communities should be fully engaged from design phase through project implementation • Capacity building training on ESMF and RPF should be provided to key staff of the Ministry of Information and Communications and other relevant stakeholders • Roles of grievance committee should be properly defined and orientation on their roles should be provided prior to commencement of resettlement processes • Regional and district land offices should be engaged in any assessment of properties and assets likely to be impacted by the project activities. • District councils should be resourced on monitoring and evaluation of project implementation. • GRM should be properly defined and orientation on their roles should be provided prior to commencement of resettlement processes, if any.
Sheku Kanneh, Director, EPA. Aiah Wurie Keimbay, Deputy Director of Operations, EPA	Environment Protection Agency (EPA)	• Project briefs should be submitted to EPA before implementation of project activities to seek guidance on whether an EIA or ESMP would be required by the project • Communities should be engaged during design, preparation and implementation of project activities • Project should provide resources for training staff that will be involved in monitoring of project activities. • Any possible resettlement programme that might arise from this project must make specific reference to the National Resettlement Policy and guidelines. In addition, a detailed environmental assessment should be done before any relocation takes place • Capacity building of the institution on new technologies, monitoring and collection of and management of e-waste and regulations on e-waste and international best practices • Training on occupational health and safety workers, contractors • Local councils (municipal and district) are crucial for the project implementation • There have been complaints by community members on noise generated from generators were towers are located, this need to be addressed. Solar – environmentally friendly energy generation sources would limit potential conflicts and health impacts resulting from generator noise. • Any potential resettlement programme that might arise as a result of this project must avoid environmentally sensitive areas.
Marie Momoh, Director, UADF	Universal Access Development	• She is aware of the project and believe that it is a good project for the country. • The role of UADF is to promote universal services and access to information and telecommunication services to all Sierra Leoneans particularly those living in the rural, un-served, and underserved areas. This project will complement our effort.

Name and details	Institution	Remarks
	Fund (UADF)	• The project is expected to expand to rural areas • It will definitely increase socialisation, improve livelihoods and enable rural poor to realize their potential through access to internet connectivity. • In order to mitigate the potential impact on communities, the project should focus more on local solutions to solve issues in the rural area. • The installation of more poles will have an impact on the surrounding environment. There is a need to install fewer network poles and increase their utilizations in far to reach areas. • Parties that might be interested in the project includes: NATCOM and DSTI • The communities have their own way of solving grievances, but I am not sure this project will lead to any grievance within the community.
	Telecoms (Orange, Africel and QCell	• On environment, the project should make use of existing infrastructure like existing towers instead of creating a new way-leave but can discuss with the owners. This will reduce time, cost and also vandalism. •
Daniel B Kaitibi, Director General	National Telecommunication Commission (NATCOM)	• Authority – enforcement powers • Access to infrastructure (electricity and internet) is still insufficient to support development of digital space • Lack of policy and legal environment to support digital entrepreneurship (for example, intellectual property right, tax incentive). • Inadequate legal and regulatory framework to enforce compliance • Limited capacity of the Ministries, departments and agencies to implement digital-related policy and regulatory framework. • National roaming to increase internet penetration across the country • Parliament to enact regulations • Equipment required to ensure effective implementation of the regulator • National data centre absent • Lack of spectrum monitoring makes our work difficult • Access points and provide free Wifi hotspots for university students, schools and hospitals • There should be mechanism to monitor Misuse and ethical use of internet in public spaces. • Communities should benefit from power generations of those towers built by Telecoms to increase internet connectivity access in remote communities.

Name and details	Institution	Remarks
		• Payment for landownership should benefits a host of community stakeholders such as land owners, local councils, chiefs, MPs, etc. • Concerns more about project sustainability in the long-term. • There is a need to secure another fibre optic to increase competitiveness, accessibility and affordability. • Capacity development of NATCOM should be a major priority in this project to enable us to become strong regulator. • Increase penetration • There is a need for market survey to understand the operational dynamics • There is a need to harmonize regulations related to Mobile Money between NATCOM and BSL
Khalil Kallon, Executive Secretary, Independent Media Commission	Independent Media Commission (IMC)	• Aware about the transformation project in the broadcast sense to migrate from analog to digital but still waiting on it as it has not been done yet. • General opinion is that it should have happened in 2015 but still waiting on it to happen as the broadcast system in the country is still analog. The analogical system is affecting the allocation of frequencies and licenses. Digital migration will be easy for media institutions especially the electronic media to establish more media institutions. There will be more service providers with digital transformation compared to the analog system which just accommodates one service provider. Digital migration is right for broadcasting and the country to move towards that end. • The impacts on communities increase accessibilities. Connectivity will have stable internet connectivity across the country. The phone internet network will be stable. Low data rate in mobile communication systems. Accessibility enables people to do research for academic work in educational institutions, and also helps in achieving work timelines in offices. Generally, digital transformation is good for the country and development in the ICT sector. • General concerns are looking for a more stable digital space for media industries and a system to be monitored and regulated in cyberspace. People cannot just do what they want to do in cyberspace. There should be control on hate speech, disinformation, and misinformation to be curb.
Abu Bakarr Bangura, Director of Research,	National Disaster Management Agency (NDMA)	• The project will help leapfrog the country in the right development trajectory. • It will have positive impact on data management, education, e-commerce and banking, risk assessments and mapping, and risk reduction activities especially early warning systems in vulnerable communities because with very good early warning systems, disasters can be prevented and lives and property saved.

Name and details	Institution	Remarks
Monitoring and Evaluation. Agnes Farma, Deputy Director of Research, Monitoring and Evaluation		• The project will support the capacity of communities to go digital by making the internet available and easily accessible to all. • The project will reduce the cost of the internet, especially for vulnerable groups to allow them to expand their ability to think and open up their space to learn more. School-going children should also have internet access • Other parties like the government, the private sector, universities and research institutions might be interested in/concerned about the project. • Community engagement and awareness raising is critical for the effective implementation of the project. • The project should make sure that no one is left behind especially the most vulnerable groups like persons with disability. Their needs and involvement in decision making and concerns is essential during the implementation of this project. • The digital transformation project will expand the use of internet among civil service officials in ministries, department and agencies. • Training of youths and other beneficiaries to ensure use of internets in rural communities. • Monitoring of such projects should be spearheaded by the implementing partner with an understanding of other partners to do joint monitoring assessment.
Brima Hakawa Moseray, Director of Planning, NCRA	National Civil Registration Authority (NCRA)	• The project should ensure that the population have access to internet at a cheaper rate especially in educational institutions. “if internet becomes cheap, education will be easier for students”. • There is a need to do needs assessment surveys before the commencement of the project to know how to do it, when to do it, where to do it, and the possible challenges. • The impact of the project will only be realized when community’s social welfare, livelihoods, and socialisation needs are addressed. • Community aware about the project should be enhanced. • NCRA remains central to this project as it will help to address our records • Community grievances are settled through local authorities and sometimes elders within the family. There is no better mechanism for better conflict resolution of community grievances except that those local authorities should work with the police. • Communities get information through radios which has over the years proven to be a major and effective way of communication.

Name and details	Institution	Remarks
Saa Lamin R Korteque, Executive Secretary Dr Abdulai Dumbuya, CEO, Dorothy Springer Trust(DPO	National Commission for Persons with Disability	• They are aware of the project and have been part of the online conversation with the World Bank mission to express their perspective on the project. He expect total transformation of the digital landscape in the short, medium and long-term • He thinks the project is a good one if implemented well but raises concerns around accessibility issues for persons with disabilities. • The project should focus on training persons with disability in the digital space on social marketing, multimedia, editing and possibly upgrade the ICT training centre of the Dorothy Springer Trust that is already providing trainings for disabled. • There is a need to use a twin-track approach thereby they push for digital inclusion at a cheaper rate and at the same time building the capacities of Disabled Persons to have an independent mind-set. • Establishing a digital server at the Commission to serve as the hub for all disability issues in the country. • Intensify training in the rural areas to avoid marginalization • Abuse of digital systems and uncontrolled cybercrimes • Transforming to a digitized system will also discriminate against people who have never been to school (they are in majority of our population). Digital inclusion will be a challenge especially in rural communities where there is a lack of access to electricity and internet connectivity • One way to mitigate these negative impacts is to develop complementary programs, especially for disabled persons. So if someone cannot fit into one system, he/she can fit into another. • Community awareness and sensitization to all corners of the country is key to the overall project implementation • We expect other parties such as People with disability organizations, Families of people with disability, Family support groups, Civil Society Organizations, The national government and Non-Governmental Organizations to benefit from the project. • Grievance redress mechanism designed in collaboration with the anti-Corruption Commission has proven to be very important, especially working with persons with disabilities. But however, a better mechanism for resolving community grievances is the establishment of a management team. • Hope that the issues of inclusivity are followed to the letter to ensure that marginalized groups like persons with disabilities are given serious consideration to effectively utilize whatever the outcome of the project might be

Name and details	Institution	Remarks
		• Direct financial resources to disabled person's organizations and provide mentorship through NGOs rather than doing the reverse
	Traditional authority	• The initiative is good if they fully implemented it and actualize the objective of the project. • Expand access to internet and increase skills development should be the priority for funding. • My expectation from this project is to see an increase in internet coverage nationwide. • The project can have both positive and negative impact. Positively, it will increase internet access especially for students and increase internet penetration across the country. Negatively, there will be challenges to filter accurate information, increased time spent on social media especially students that would likely reduce their educational outputs. • The government should monitor the ethical use of internet to avoid misuse • A project like this will increase community knowledge and awareness • This project does not have impact on the environment • The Parties that might be interested in/concerned by this project includes: Universities, Meteorological agency, Schools, Hospitals and every sector will be interested in this project. • Community problems/grievances are resolved through the chief and the legal aid representative. • Communities normally get information from: Legal Aid Representative through the Town Crier, Religious leaders and Community town hall meetings
	Community meetings	• The project is a good one as it will improve the digital skills and literacy and increase access to internet connectivity in the communities. • There is a need to increase internet accessibility for all by making it cheaper through the telecoms companies. • Expanding coverage and community sensitization will help improve internet usage. • They were concerns about the over usage of internet will lead to less productivity in other areas such as education for students in schools and universities. There should be a way to restrict internet usage to some extent • Misuse of internet • Compensation for possible loss should be done in cash • The forms of assistance they expect from the project include jobs and technical training

Name and details	Institution	Remarks
		• Channels where they receive of communicate information: WhatsApp, Instagram, Facebook, Tweeter, and emails, and meetings • The ICT tools they generally use are mobile phones and laptops • Grievances from the proposed project can effectively be handled through community engagement and setting up of a community • Possible roles that will be played by the youths include community sensitization, training, labour and serves as security to secure the assets in the community • Concern about the lack of electricity and challenge of internet access and connectivity in hard to reach communities where mobile communication towers are absent
Sylvester Bewie, Director of Programs	National Youth Service Commission	• It is a nice project, as digitalization is a global trend, everybody's moving in that direction, to get things done quickly and efficiently. Other countries have taken the lead but ours is only coming on board now; I believe it is a step in the right direction. • A project of this nature should finance activities, such as taking broadband internet connectivity into the educational institutions, digitize all Ministries, Departments, and Agencies and creating an enabling environment for private sector institutions, also to get access to broadband internet • Community engagement and sensitization is key to the successful implementation of this project Therefore, for the project to be viable and sustainable, it depends on the type of engagements you undertake so, the people must be included in the decision making process related to the project. • Facilitate rapid training of the beneficiaries to utilize the proposed digitalized system • The negative impacts of the project will be an increase cybercrime rate in all facets of the community and the proliferation of pornographic materials if not controlled. This can however be mitigated through community sensitization and enforcement of relevant laws and regulations enacted by parliament through legislations. • The community, the private sector and government are the key beneficiaries of this project. • In some communities, grievances are resolved by the elders of that community as they take that leadership role to bring together the people involved and settle their issues amicably. The best way of resolving grievances or disputes among people is a dialogue and mediation. • For urban communities, they can get information from various sources like: social media, television, books, the print and broadcast media, community leaders. Also, rural residents normally express their views in: community meetings, and household heads representing them in meetings.

Name and details	Institution	Remarks
	Students (schools and universities)	• The community considers the project as a good initiative as it will improve our education system, provide effective and affordable healthcare for all, reduce poverty and improve livelihood opportunities and improve digital skills. • Most community residents will not benefit from the project as they cannot afford smartphones. • Services may not be effective as anticipated because other areas like electricity generation need to be sustainable to effectively provide the intended services • Misuse and unethical use of internet might increase cybercrime rate. Affordable access to internet will expose our children to pornography and other indecent lifestyle. • Concerns were raised about maintenance and sustainability of the project interventions once World Bank funding lapse • Compensation for possible losses arising from the project should be done in cash and in kind. • Community should be in the management of the project and employ them on the project site. • The channels community mostly receive of communicate information through radio, television, social media (WhatsApp and Facebook). • ICT – smartphone, laptop computer • Community engagement and sensitization • Concerns about project location and potential benefits to the institutions/schools
Robert Fefegula, Business development manager	Business development	• Overall, it is a welcoming idea and initiative given digital divide in Sierra Leone extended nationwide. This transformation will help to broaden people's capacity in terms of technology. • The key impact of the project will increase the skill set because the people don't have the necessary facilities. Good ICT to improve human capital development in Sierra Leone. The transformation will increase ICT usage, and increase knowledge. • Improved ICT equipment.