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SIERRA LEONE DIGITAL TRANSFORMATION PROJECT (SLDTP)

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STAKEHOLDER ENGAGEMENT PLAN (SEP)

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ACRONYMS AND ABBREVIATIONS

A4AI	Alliance for Affordable Internet
ACE	Africa Coast to Europe
AT	Assistive Technology
CA	Certificate Authority
CERC	Contingent Emergency Response Component
CII	Critical Information Infrastructure
CIIP	Critical Information Infrastructure Protection
CISO	Chief Information Security Officer
DE4A	Digital Economy for Africa
DIAL	Digital Impact Alliance
DSTI	Directorate of Science, Technology, and Innovation
EA	Enterprise Architecture
ECF	Extended Credit Facility
ECOWAS	Economic Community of Western African States
EGDI	E-Government Development Index
EOC	Emergency Operation Center
EPA	Environment Protection Agency
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Safeguards
EWS	Early Warning System
FM	Financial Management
GBV	Gender Based Violence
G2B	Government-to-Business
G2C	Government-to-Citizen
G2G	Government-to-Government
GDP	Gross Domestic Growth
GoSL	Government of Sierra Leone
GSMA	GSM Association
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IaaS	Infrastructure-as-a-Service
IPPF	Indigenous People Planning Framework
IXP	Internet Exchange Point
LMP	Labor Management Procedure
MDAs	Ministries, Departments, and Agencies
M&E	Monitoring and Evaluation
MFD	Maximizing Finance for Development
MIC	Ministry of Information and Communications
MISP	Malware Information Sharing Platform
MOF	Ministry of Finance
MOPED	Ministry of Planning and Economic Development
MSSP	Managed Security Service Provider
NATCOM	National Telecommunication Commission
NCA	National Communication Authority
NCCC	National Cybersecurity Coordination Centre
N-CIRT	National Computer Incident Response Team
NCPD	National Commission for Persons with Disabilities
NCRA	National Civil Registration Authority
NDDA	National Digital Development Agency
NDDP	National Digital Development Policy
NDDS	National Digital Development Strategy

NDMA	National Disaster Management Agency
NDTR	National Digital Transformation Roadmap
NIDS	National Innovation and Digital Strategy
NRA	National Revenue Authority
OPDs	Organisations for Persons with Disabilities
PaaS	Platform-as-a-Service
PIU	Project Coordination Unit
PIM	Project Implementation Manual
PKI	Public Key Infrastructure
PPA	Project Preparation Advance
PoP	Point of Presence
PSC	Project Steering Committee
PWDs	Persons with Disabilities
RPF	Resettlement Policy Framework
SA	Social Assessment Report
SALCAB	Sierra Leone Cable Limited
SALPOST	Sierra Leone Postal Service Limited
SEP	Stakeholder Engagement Plan
SLDTP	Sierra Leone Digital Transformation Project
SLIHS	Sierra Leone Integrated Household Survey
TC	Technical Committee
TIA	Technical Implementation Agency
TOR	Terms of References
SMP	Significant Market Power
SMS	Short Message Service
SOP	Standard Operating Procedures
UADF	Universal Access Development Fund
UNICEF	UN Children's Fund
US$	United States Dollars
USSD	Unstructured Supplementary Service Data
WARCIP	West Africa Regional Communications Infrastructure Program
WB	World Bank
WBG	World Bank Group
WDR	World Development Report

I. EXECUTIVE SUMMARY

The Sierra Leone Digital Transformation Project (SLDTP) Stakeholder Engagement Plan (SEP) is designed to enable an effective platform for productive interaction between the Government of Sierra Leone (GoSL) and the potentially affected parties and persons with interest in the implementation and outcomes of the SLDTP. It identifies the major stakeholders affected by the project either directly or indirectly (including vulnerable and marginalized groups) as well as those with other interests that could influence decisions about the project. The SEP is also prepared to demonstrate the GoSL's commitment to best practices in project management and compliance with the World Bank's corporate requirements on citizen and stakeholder engagement and information disclosure.

The STDTP aims to expand access to broadband internet, increase digital skills and improve government capacity to deliver public services digitally. The project will support a strong enabling environment for fast-tracked digitization; promote a shift in digital government services from service to life-event focused approach to enhance the Government's digital capabilities; increase Sierra Leone's capacity to promote digital innovation and sector-wide digital transformation in selected strategic sectors and boost digital skills development and capability to increase Sierra Leone's digital talent base.

Based on the planned interventions, the project environmental and social risk has been rated as moderate. The anticipated environmental and social risks have been identified and mitigation measures proposed in the Environmental and Social Management Framework (ESMF) prepared for the project. Several stakeholder engagements have been carried out through various channels during preparation and design phase of the project, as well as engagement and sensitization for this project, including consultative meetings with stakeholders such as National Telecommunications Commission (NATCOM), Directorate of Science, Technology and Innovation (DSTI)), Environmental Protection Agency (EPA), National Commission for Persons with Disabilities (NCPD), Office of the President, Head of Civil Service etc. Also a few consultations and focused group interviews were conducted as well as scheduled.

Stakeholder groups identified under the project include individual beneficiaries, communities, private sector entities, contractors, training service providers, government agencies, development partners, Civil Society Organizations (CSOs), Non-Governmental Organizations (NGOs), academia and research institutes. Vulnerable and marginalized groups identified include women, youth, elderly, persons with disabilities and low-income households, hard to reach and rural communities.

Strategies for engaging stakeholders identified in this SEP include use of both traditional and modern media communication channels such as websites, printed media, information center boards, community and town hall/public meetings, newsletters, brochures, fact sheets, conducting of periodic focus groups, surveys, and independent evaluations, and the establishment and operationalization of a Grievance Redress Mechanism. Follow up on grievances and actions taken will form part of the overall monitoring of the project. Furthermore, various strategies for involving stakeholders in project monitoring and reporting have been identified. Resources and implementation arrangements for SEP activities are included in Component 4 of the project and will be mainstreamed in the activities of the implementing agencies and partnering Ministries, Departments and Agencies (MDAs).

II. INTRODUCTION

Background and Objectives

The proposed Sierra Leone Digital Transformation Project (SLDTP) is intended to accelerate access to, usage of, and innovation in digital services by supporting inclusive and fast-tracking digital transformation. The project will enable citizens, start-ups, schools, colleges and universities ICT users, small and medium enterprises (SMEs) and Government to benefit from digital services in the form of steady digital growth, job creation and greater digital efficiency.

The project activities will be implemented under a variety of environmental and social conditions. The Environmental and Social risks associated with these activities are both rated as moderate. Hence, the project is not anticipated to have significant adverse impacts on people or the environment. It rather provides an opportunity to close digital gender gaps and internet access gaps between urban and rural areas. Although the scope of the anticipated civil works under the project is not relatively limited, it is expected to be with temporary and site-specific impacts. During the project preparation, relevant measures to avoid, reduce, or mitigate risks and adverse impacts on the environment and vulnerable populations will be identified and as such, the overall Environmental and Social Assessment (ESA) process of the project will be based on the WBG's Environment, Health, and Safety Guidelines (EHSGs) and Assessment and Management of Environmental and Social Risks and Impacts.

The Stakeholder Engagement Plan (SEP) is one of the required environmental and social instruments of the Sierra Leone Digital Transformation Project, referred to hereinafter as "the Project".

The Sierra Leone Digital Transformation Project has a wide range of stakeholders that may influence or be influenced by its implementation. The identification of these stakeholders is thus crucial for the adequate design and implementation of the Project as well as for the preparation of effective SEP.

Stakeholders include persons or groups directly or indirectly affected by the SLDTP, as well as those who may have interest in it and/or the ability to influence its outcome, either positively or negatively. This Stakeholder Engagement Plan (SEP) is designed to establish an effective platform for productive interaction with these potentially affected parties and others with interest in the implementation and outcomes of the project throughout the project cycle. The SEP is prepared in compliance and in accordance with the World Bank Environmental and Social Standard 10 (ESS10) on stakeholder engagement and information disclosure.

This SEP identifies the project major stakeholders, outlines the engagement approach and articulates a range of strategies for timely, relevant and accessible stakeholder engagement throughout the project life cycle. The SEP also emphasizes the borrower's commitment to comply with the World Bank's requirements on citizen engagement, to ensure that the relevant information about the project is disclosed appropriately and timely to all stakeholders.

Objectives of the SEP

The main objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation under the STDTP. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns and provide feedback about activities related to the project. The specific objectives of the SEP are to:

- Establish a systematic approach to stakeholder engagement to identify stakeholders, especially project affected parties, and to build and maintain a constructive relationship with them.
- Assess the level of stakeholder interest and support for the project and take into consideration the stakeholders' views throughout the project cycle
- Promote and provide means for effective and inclusive engagement with stakeholders throughout the project life cycle on issues that could potentially affect them
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format
- Provide project-affected parties with accessible, inclusive, and culturally sensitive means to raise issues and grievances, and allow the Government to respond to and manage such grievances effectively.

Purpose and timing of SEP

This SEP is designed to establish an effective platform for productive interaction with the potentially affected parties and others with interest in the implementation outcome of the Project. Meaningful stakeholder engagement throughout the project cycle will:

- Inform stakeholders about project objectives, scope and manage expectations
- Solicit feedback to inform project design, implementation, monitoring and evaluation
- Assess and mitigate project environmental and social risks
- Enhance project outcomes and benefits
- Build constituencies and collaboration
- Disseminate project information/ materials
- Receive and address project-related grievances

Adequate stakeholder consultations will require effective timing and advanced planning. To ensure information is readily accessible to affected stakeholders, and adequate representation and participation of the different groups in the process, the PIU at the MIC will adopt different strategies based on an assessment of stakeholder needs.

Project Description

The Project aims to expand access to broadband internet, increase digital skills and improve government capacity to deliver public services digitally. The Project proposes five integrated and mutually reinforcing components briefly discussed below,

Component 1: Expanding Digital Access and Increasing Resilience of 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$5.4 million)

This subcomponent will strengthen upstream policy and regulatory environment in each stage of the broadband value chain necessary for providing reliable and affordable internet services, promoting market competitiveness and private sector investment in line with a Maximizing Finance for Development (MFD) approach.

In the first mile (international gateway) of the broadband value chain, the activity will address the potential risk of having a single submarine cable landing station and the de fact monopoly of international gateway which has resulted in a sub-optimal efficiency of the broadband market in Sierra Leone. The project will provide technical assistance (TA) to support the sector regulator to (a) develop options for increasing network redundancy and (b) provide measures to address the climate vulnerabilities of the submarine landing cable with the aim of increasing the overall climate resilience of digital infrastructure. These activities will be complemented by technical assistance work being funded by the Public-Private Infrastructure Advisory Facility (PPIAF) to strengthen the enabling policy, legal and regulatory environment for improved private sector participation specifically focused on a comprehensive mapping exercise to assess the status of *supply*—digital infrastructure and service availability, *demand*—based on the demand topology to be developed, and *investment*—the existing and planned investments in digital infrastructure by the private and public sectors and PPIAF's Climate Resilience and Environmental Sustainability (CREST) support for Sierra Leone's digital infrastructure and services.

In the middle-mile and invisible-miles of the broadband value chain, the project will support the Government's effort to address challenges related to competition and high prices of telecommunications services. Key activities will include support to develop (a) Significant Market Power (SMP) legislation, (b) clear interconnection regulations, (c) tariff/cost studies to ensure fair pricing to boost market competition and increase affordability of broadband services, and (d) purchase of equipment and development of regulatory capacity for efficient spectrum monitoring and management. In view of the importance of Internet Exchange Points (IXPs) in lowering internet prices, the project will support a technical study, including internet traffic assessment, business model identification, and operational guideline development, to lay the operational basis to create a Sierra Leone Internet Exchange Point (SLIX). Based on the technical study findings, the project will finance the purchase of equipment for SLIX. To establish sustainable IXP after several unsuccessful attempts in the past, this activity is agreed to take a joint industry approach with private sector operators and aims to nurture trust between the Government and private sector operators.

The Subcomponent will also provide support for a robust and inclusive National Broadband Strategy to underpin these interventions. The Strategy will have clear targets for expanding access to broadband internet connectivity and narrowing digital divides particularly among marginalized population, including women and Persons with Disabilities (PWDs). The project will also support an institutional gap assessment of emerging new institutions, such as NDDA and NCA, which are expected to implement the country's broadband strategy, and provide operationalization and capacity development support based on the findings of the gap assessment.

Subcomponent 1.2. Last-mile Connectivity Access for Public Institutions (US$10.2 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 steppingstone to improving coordination and management among MDAs, which will support wider adoption of public financial management systems and platforms (e.g. IFMIS, e-Procurement,

etc.), better government wide communication and response in national emergencies, such as natural and man-made disasters. The approach being applied for last-mile connectivity under the project is demand aggregation and prepurchase 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 long-term supply agreements with GoSL. No direct network construction will be financed, though it will incentivize the private sector network investment if deemed necessary. The specific locations and target number of institutions will be determined based on the findings of the PPIAF funded comprehensive mapping exercise to assess the status of demand and supply of the existing and planned investments in digital infrastructure by the private and public sectors, followed by the technical feasibility study. The list of public institutions will also reflect the priority sites identified in close collaboration with various MDAs as well as other on-going World Bank funded projects to maximize synergies and development impacts.

Subcomponent 1.3. Inclusive Access for Underserved and Marginalized Communities (US$2.5 million)

This subcomponent will address several access gap and digital divide issues and support digital access inclusion especially for women and the persons with disabilities (PWDs). Despite the efforts to stimulate competition and private sector infrastructure investment, additional measures will be necessary to ensure availability of affordable broadband internet access in rural areas and among the most marginalized populations. While the project primarily focuses on improving access to broadband connectivity in urban and peri-urban areas, this subcomponent will address urban-rural access gap by rolling out innovative pilot measures to expand access to internet connectivity in selected rural areas where quality broadband internet is not available. For the areas with low average incomes and/or low population density, the project will examine and apply innovative business models and technologies to enable the private sector to deploy affordable broadband internet services. Key activities will include: (i) Pilot least-cost subsidy reverse auctions to incentivize the private sector to deploy shared infrastructure and mobile broadband services (3G/4G) in selected rural and remote areas, (ii) the purchase of Assistive Technology (AT) digital equipment that can enable access to digital technologies and broadband internet for selected Organizations for Persons with Disabilities (OPDs), and (iii) partnership with the private sector, NATCOH, UADF, and academia to pilot innovative technologies or business models for rural broadband deployment.

Smart Device Financing Pilot Design. In addition to improvements in network connectivity infrastructure, broadband connectivity requires additional components such as end-user equipment and devices to increase adoption and usage of internet. The GoSL believes affordable internet-connected devices will significantly contribute to increased internet access and usage. The project will design a pilot scheme to finance smart devices based on a comprehensive market assessment of the current smart device access and device financing ecosystem in Sierra Leone. The market assessment and feasibility study will identify key supply- and demand-side barriers to smartphone ownership and usage in Sierra Leone depending on different user groups including through a survey methodology and propose target groups suitable for various financing schemes. Based on the identified barriers and target beneficiary groups, the project will design a small-scale pilot (including financing needs) that could be implemented in the limited geographic area under the project. The actual implementation of pilot is not included in the project budget, however, the findings of the feasibility study and possible integration in the subsequent phase of financing opportunities could be discussed at Mid Term Review.

[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.

Subcomponent 1.4. Increasing Resilience of Digital Environment (US$3.5 million)

This Subcomponent aims to increase the overall resilience of digital environment by enhancing cybersecurity and climate resilience. The project will support increasing cyber resilience by boosting the government capacity to address cybersecurity risks and to protect critical information infrastructure from these risks as well as by fostering safe online environment. This component will also finance activities to enable data-driven climate adaptation measures at various stages of climate early warning communication value chain focusing on EWS communication infrastructure deployment, EWS information generation, and last-mile information dissemination. To promote greening ICT sector, the component will also support developing e-waste management policy framework based on a circular economy approach.

(a) Enhancing Cyber Resilience. This subcomponent will support strengthening Sierra Leone's cyber resilience through institutional capacity development, critical infrastructure protection, and increase in public awareness in cybersecurity. Addressing growing and evolving cyber risks and threats should be a forethought for ensuring 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 GoSL's National Cybersecurity Strategy 2021-2025.

Critical Information Infrastructure Protection (CIIP). The subcomponent will support the operationalization of Critical Information Infrastructure Protection provisioned by the Cybersecurity and Cybercrime Act of 2021, which was enacted in November 2021. The activity will adopt a two-pronged approach for CIIP. First, the subcomponent will support the identification of sectors and systems to be considered as critical information infrastructure (CII) by establishing a set of criteria to define CII and the development of nationwide Critical Information Infrastructure Protection (CIIP) Plan Directive, which will define the criteria for assigning and designating critical information infrastructure (CII) and sets out processes, requirements, and specific standards for CII sectors/systems to consider when devising sector-specific CIIP plans. The CIIP Plan will also identify functional dependencies between CII sectors/systems, ensure effective coordination and information exchange across various CII sectors and relevant agencies, operators, and stakeholders, and elaborate reporting mechanism to keep updated on the status of various CII sectors/systems. Subsequently, this subcomponent will support development of sector/system specific CIIP Plans for priority 3-4 sectors such as financial services, government, telecommunications, energy, and aviation. Support will include a review of legal and regulatory frameworks necessary for implementing the CIIP Plan. Once the critical information infrastructure is defined and identified, the activity will support the development of risk registries and Standard Operating Procedures (SOPs) for selected priority critical information infrastructure.

National Cybersecurity Coordination Centre (NCCC) and National Computer Incident Response Team (N-CIRT). This subcomponent will also support the operationalization of the NCCC which will house the Sierra Leone N-CIRT. Purchase and installation of key operational infrastructure, such as a threat intelligence monitoring and management system (MSSP, MISP, or similar) an incident management platform, contact center platform, information sharing platform and other software licenses, for NCCC will be financed. 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 (e.g. GoSL pays for the annual subscription of software licenses after the project closing year) beyond the project cycle. For sustainable operationalization of NCCC and N-CIRT, the project will support the development of critical paths and roadmap. In addition, under this component, training, and capacity building activities will be financed, particularly for civil servants

working in the relevant domains of cybersecurity such as CIRT staffs, CII operators and managers, and Chief Information Security Officers (CISOs) across the government.

Cybersecurity Skills and Online Safety Awareness. This subcomponent will support developing Sierra Leone's cyber expertise and skills capacity and enhance Sierra Leoneans' day-to-day cybersecurity and online safety awareness and behavior. Key activities under this subcomponent include:

i. TA to support the development of National Strategy on Cybersecurity Skills and Cyber Awareness and Action Plans to help the GoSL implement the Strategy. The Strategy will be anchoring document to outline the GoSL's vision towards nurturing cybersecurity skills development and fostering cyber safe culture to enable resilient environment for digital transformation. The Cybersecurity Skills section of the Strategy will lay out the GoSL's vision for creating a vibrant cybersecurity skills development and training ecosystem that can weave into both informal training opportunities and the formal education curricula. Furthermore, the Strategy and the Action Plan will be developed to incorporate the principles of inclusion to unleash opportunities for marginalized communities, particularly women, people in remote/rural areas, and PWDs. The TA would support the implementation of a selected activities from the action plan.
ii. The Cyber Awareness section of the Strategy and the Action Plan will lay out the GoSL's vision for increasing cybersecurity awareness for the public and facilitating the basic "cyber hygiene" practices among the individuals, businesses, and communities in Sierra Leone. While the activities targeting specific population groups (e.g. Critical infrastructure operators, schools, hospitals) will be further calibrated based on the findings of the cybersecurity skills baseline assessment described above, the initial phase of the support will focus on designing and piloting awareness campaign for the mass population in Freetown and major cities.

Cybersecurity Maturity Model Assessment. Lastly, this subcomponent will include TA to undertake the next round of the Cybersecurity Maturity Model Assessment[2] and identify the progress made and propose the next action plan.

(b) Strengthening Climate Early Warning Communication. This subcomponent will strengthen digital communication systems across climate information value chain underlying Emergency Operation Center (EOC) housed within National Disaster Management Agency (NDMA) to facilitate the Early Warning System (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 the government offices, mobile network operators, and non-government organizations, (NGOs) to adopt Common Alerting Protocol (CAP) standard. For effective last-mile information dissemination, the project will finance 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 to the citizens through text messages (e.g. USSD), voice-based services (e.g. IVR), and mobile and web-based interfaces such as WhatsApp and Facebook Messenger.

[2] GoSL has completed CMM assessment in 2016.

(c) E-Waste Management: This Subcomponent will also support the GoSL with developing e-waste management policy framework based on a circular economy approach as an initiative to green ICT sector. Currently, while dialogues for e-waste management policy in Sierra Leone have begun, it is in a draft stage in the Sierra Leone Environmental Protection Agency (EPA). To finalize the e-waste management policy, EPA needs quantitative and qualitative baseline survey, which has not been initiated due to the lack of financial resources. The activity will finance such baseline survey to assess the footprint of e-wastage in Sierra Leone and support finalization of the e-waste management policy in Sierra Leone. The policy framework will also include the development of e-waste reduce, recycle, and reuse (3R) strategy to address the full lifecycle of electronic devices and equipment, thereby building a complete circular system.

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 marginalized communities, enabling them to develop and utilize digital skills to improve their livelihoods and address challenges in their communities. This component will support vulnerable youth by enabling their participation in online and in-person digital skills training courses, thereby increasing their employment opportunities. The project will include targeted outreach and awareness-raising activities to recruit beneficiaries, including young women and youth with disabilities. Given that digital skills agenda is nascent in Sierra Leone, the design of 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 for youth to access livelihoods opportunities through the gig economy.

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

Comprehensive market study to assess the supply and demand of digital skills. The market study will assess available skills in the target areas, determine in-demand skills, identify bottlenecks in the digital jobs value chain,[3] and inform the design of an appropriate demand-driven training curriculum targeting youth, women, and PWDs 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 digital skills training to beneficiaries with basic literacy and numeracy skills, as well as those seeking to be re-skilled.

Feasibility assessment for the potential of the gig economy to provide youth with access to new and/or supplemental income opportunities. The study will assess gaps and barriers affecting the digitization of traditional and non-traditional jobs, and identify potential entry points for public sector, private sector, and community organizations to accelerate job digitization. This assessment will include a mapping of local, regional, and global gig platforms who may serve as potential partners to provide training and employment opportunities to target beneficiaries. The study will also assess the market for on-demand service platforms that enable traditional and informal workers to market their services and connect directly to customers.[4] The assessment will also highlight the potential of community-driven gig work, which provides opportunities to build digital skills and generate supplemental income while addressing

[3] Digital jobs are not only limited to careers within the IT industry (e.g., software development, hardware design), but exist across all industries. Reference to 'digital jobs' include work across all industries that is increasingly digitized (e.g., accounting, cashiers), work that is performed online through digital platforms (e.g., microwork, freelancing), as well as traditional jobs where workers can connect with potential customers through digital platforms (e.g., e-commerce, on-demand services).

[4] For example, iCreate Africa (https://icreateafrica.com/) is an online platform that aims to facilitate employment in technical and vocational jobs such as plumbers, electricians, mechanics, or construction workers.

challenges in local communities.[5] 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 from this assessment will inform the design of the digital literacy training program and innovation activities connecting beneficiaries with short- and long-term employment opportunities.

Digital Literacy Training Scheme targeting youth outside of the formal education system, with a focus on women and PWDs. The training scheme will 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 study, and will also emphasize the development of soft skills, such as an aptitude for teamwork, empathy, conflict resolution, and relationship management.[6] The training scheme will incorporate strategies to maximize recruitment, retention, and livelihood outcomes of young women[7] and young PWDs.[8] Trainers will be recruited from local communities to participate in a Train-the-Trainers program, helping ensure that the training content is relevant and contextualized. Training providers will be selected through a competitive bidding process, helping to build the capacity of local agencies and scale the impact of local organizations delivering digital skills training. The project will collaborate with global private sector companies, such as Microsoft and IBM, to finance IT equipment, software applications, and assistive technologies at training locations. The project will also establish partnerships with global IT companies and local private sector partners to provide certification of skill attainment, mentorship opportunities, and employment opportunities (including internships, part-time work, and full-time employment). Promotional activities will include campaigns to make target beneficiaries aware of the opportunities available in the digital economy, and ways that digital skills and technologies can improve their livelihoods. Following a "funnel approach," the training scheme will include a digital jobs pilot that will connect beneficiaries with livelihood 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. The program will support the growth of the digital ecosystem by launching a series of workshops, boot camps, hackathons, and other events targeting youth. Events will range from large-scale awareness raising sessions with several hundreds of participants, to smaller, more intensive workshops and boot camps for a reduced number of beneficiaries. These events may leverage open data generated from

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[5] World Bank (2021). *Digital Works for Urban Resilience: Supporting African Youth: Rapid Pilot Phase.* Washington, DC: World Bank Group, https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099830012142142800/p171990044fb250f10b66502ebf997d2a1b.

[6] Soft skills improve the adaptability of workers, allowing them to transfer easily from one job to another and adapt to the changing nature of work. Soft skills are as important as technical skills for girls and women to increase their participation in STEM-related studies and careers. World Bank (2019). World Development Report 2019: The Changing Nature of Work. Washington, DC: World Bank Group; Hammond, Rubiano Matulevich, Beegle, and Kumaraswamy (2020). The Equality Equation: Advancing the Participation of Women and Girls in STEM. Washington, DC: World Bank Group.

[7] Strategies to maximize women's recruitment, participation, and successful completion may include: flexible hours of operations that are conducive to female beneficiaries' schedules (and consider women's higher rates of household care responsibilities); locations that female beneficiaries consider safe and easily accessible; women-only training cohorts; on-site child-care; transportation stipends; meals provided; and female role-models (staff, mentors).

[8] Strategies to maximize recruitment, retention, and successful completion of PWDs may include: selecting accessible locations; equipping training locations with assistive technologies; offering transportation assistance and/or stipends; ensuring service providers are properly trained to teach PWDs.

government digitization activities under this operation. The Innovation Series will partner with women's groups, disability organizations, community centers, and youth organizations to disseminate program information, maximize recruitment of young women and PWDs, and host innovation events. The project will also work closely with private sector partners to potentially co-sponsor events, scale solutions, and provide employment opportunities to beneficiaries.

Subcomponent 2.2. Drones for Innovation (US$1.3 million)

This Subcomponent will advance Sierra Leone's Drone Ecosystem and strengthen Sierra Leone's position as a rising regional leader in West Africa for drone use cases and innovation ecosystem by providing required training for selected use cases and strengthening regulatory capacity for relevant regulatory bodies such as National Civil Aviation Authority (NCAA) and NATCOMH. To ensure meaningful impact, identification of use cases based on clearly defined challenges and problems is required, based on which training and capacity building programs for stakeholders and end-users involved in drone operations should be carefully designed in a gender inclusive manner. In addition, a sound regulatory capacity is necessary to establish consistent and predictable oversight and safety management for scaling-up drone operations.[9] Based on the lessons learned from regional and global experiences, the project will finance the use cases assessment particularly leveraging the potential of drone in addressing climate risks, such as cadastral mapping, disaster management, and agricultural data collection. The 1-2 use cases will be developed based on clearly identified gaps in tackling climate change and risks. The use cases assessment will follow the steps outlined (See Figure 4) in Playbook for Enabling Civilian Drone Operations published by Africa Drone Forum, and include stakeholder consultation and community outreach, opportunity cost assessment, business model and financing assessment, and demonstration of use cases in partnership with the private sector and local digital entrepreneurs and innovation/tech hubs network. Once the use cases are developed, the project will finance training and capacity development to drone practitioners and stakeholders adopting "train-the-trainer" model. The key activities include: (i) Review and finalization of the draft Drone Regulation currently being developed by the National Civil Aviation Authority, which will set the regulatory foundation of innovative drone usage in Sierra Leone, (ii) development of National Drone Policy and Strategy to set the strategic vision for maximizing the potential drone applications in responding to growing climate risks, (iii) drone use cases development in prioritized sectors such as medical supply chain and for sectors addressing climate risks, such as cadaster mapping and agricultural land monitoring, and demonstration of the use cases, including stakeholder and community engagement to sensitize the use of drone and stimulate youth, growth of Sierra Leone's digital innovation capacity, and private sector linkages 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 recruitment and participation of women and female entrepreneurs.

Component 3. Laying Key Foundations for Digital Government Services and Systems (US$19.5 million)

The Component 3 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. This Component is comprised of three mutually integrated subcomponents, namely: Subcomponent 3.1: Enabling environment for digital government, Subcomponent 3.2: Government Service Delivery Infrastructure and Networks, and Subcomponent 3.3. Demonstration of Digital Services and Systems.

[9] A Review of UAS Regulations and Rules in African Union Member States. Regulations - African Drone Forum

Subcomponent 3.1. Enabling Environment for Digital Government (US$3.3 million)

This subcomponent aims to lay the enabling policy and institutional environment in which the building blocks of digital government will be implemented at scale without duplication or inefficiencies across various MDAs. It will support strengthening the enabling environment for digital government by placing emphasis on policy, legal and regulatory frameworks, establishing standards to support digital service implementations, driving operational change management across MDAs, rolling out capacity building initiatives, mainstreaming EA to MDAs, and scaling the open data and data analytics efforts. Key activities for will include:

i. Review, implement and/or modernize policy, legal and regulatory frameworks to support and accelerate the digital government agenda (e.g., Open Data, Digital by Design and Mobile First).
ii. Development and implementation of 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.
iii. Organizational change management for effective digital transformation amongst the political leaders and senior civil servants. This initiative will undertake holistic actions needed to facilitate institutional coordination, ownership, and processes, to help senior stakeholders understand the value of digital transformation. The activities include conducting a change management assessment to identify change management challenges faced by political leaders and senior civil servants, to develop an action plan to mitigate the identified challenges in adopting and using these project investments and to develop a communications plan to outline key goals, target stakeholders, key messages, outreach approaches, and timeline. Training workshops will focus on communicating the strategic intent of digital transformation and the changes required. The workshops will be conducted for the politicians and senior government to equip them with the knowledge and tools to undertake the recommendations from the action plan.
iv. Technical and operational focused capacity building programs for public sector IT professionals and civil servants in charge of digital transformation across the government. The activity will increase their overall understanding, competencies, and use of digital technologies and project management in the public sector. An inclusive public sector digital skills training strategy and a structured digital skills curriculum will be developed with identification and alignment to sit-in and online courses to support the IT professionals and civil servants' job functions. This activity's digital 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.
v. Development of transition architecture and governance mechanism for the implementation of Enterprise Architecture (EA) to assess the existing EA efforts for alignment with international frameworks, and to describe and facilitate the desired state and roll-out of EA and government interoperability framework to at least ten MDAs to enable efficient and secure intra-governmental data exchange.
vi. This subcomponent aims to scale-up and strengthen Sierra Leone's Open Data initiatives and Data Analytics to operationalize the recommendations of *World Development Report (WDR) 2021: Data for Better Lives*. This Subcomponent will therefore support training and capacity building activities for selected MDAs to effectively analyse data for policymaking. A range of activities to be supported

including: (i) Development of streamlined procedures for information disclosure and practice for regularly updating the disclosed data (e.g., quarterly, semi-annually); (ii) piloting the implementation of the data disclosure procedures and practice across selected MDAs; (iii) provide 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) partnerships 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 linkage with Subcomponent 1.1.

Subcomponent 3.2. Government Service Delivery Infrastructure and Networks (US$10.1 million)

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

Addressing and implementing prioritized government network upgrades. A comprehensive assessment of the current government network, a transition strategy, and a phased implementation plan will be financed to guide the MIC towards an optimal network design for GoSL's needs that is aligned with international network standards. The scope of implementation will be sized according to phase 1 of the implementation plan with an estimated network connectivity for fifty prioritized MDAs.

Assessing gaps and recommendations to establish a national cloud enabled data centre and setting up the national Public Key Infrastructure (PKI). To support GoSL's ambition for rolling out digital government initiatives, gap assessment will be conducted on core infrastructure i.e., national cloud enabled data centre and PKI. Recommendations on technical architecture and operational design will be made to address existing core infrastructure gaps, development of blueprints to guide on government-wide implementations, and the development of technical specifications for procuring new infrastructure components e.g. Infrastructure-as-a-Service and Platform-as-a-Service will be developed to support GoSL's implementation effort.

Establishing a common notification and communications platform to serve the needs of MDAs. An assessment to rationalize and synthesize the two existing platforms, namely, the Government Service Platform (GSP) that is implemented by DSTI which presently offers communication channels inclusive of USSD and SMS, and Government Integrated Messaging System (GIMS) which offers email, short code messaging and online chat. The objective is to avail a unified and simplified notification and communications platform to serve MDAs' needs in communicating and notifying citizens on public service transaction statuses, to solicit feedback from citizens and to broadcasting messages e.g. emergency alerts. This activity will contribute to a significant enhancement of Citizen Engagement channels in Sierra Leonel to facilitate more frequent and timely communication between citizens and the Government.

Establishing pilot Digital Access Points (DAPs) for citizens by leveraging on existing citizen-facing outlets such as post offices, digital learning hubs, internet cafes, etc. for citizens to gain access to internet and basic government and private sector services. The DAPs will be distributed across the central business district, west end, and east end of the capital. A feasibility study will be conducted to identify potential sites to serve as DAPs, assess the availability of internet connectivity and viability of provisioning high transaction volume public services inclusive of birth and death certification, passport,

driver license and police clearance applications. The number and location of DAPs to be piloted will be determined based on the findings of the feasibility study, which will take into account the demand for services and demographic information, particularly women's accessibility.

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

This subcomponent will support the implementation of prioritized digital services of high demand. It will finance at least three high impact citizen/business service development based on the public service landscape review explained below. Also, it will support digitalization of the three distinct branches of the Government including: to (a) develop the e-Cabinet system to support evidenced-based decision making, (b) develop the e-Parliament system to strengthen the bond between parliamentarians and their constituents, and (c) provide a TA to lay a blueprint for e-Justice system in Sierra Leone.

Government-to-Citizen (G2C) and Government-to-Business (G2B). A public service landscape review will be conducted to prioritize high-demand, high-impact digital services suitable for implementation. At least three public services e.g. birth application, death application and driver's license application, will be developed and applying the Digital Service Standards highlighted under sub-component 3.1 to align with good practices on design thinking principles. The services will be implemented through a prototyping approach to facilitate iterative feedback by citizens and public sector stakeholders to ensure their needs and expectations are addressed adequately.

Government-to-Government (G2G) systems. The activity 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 digitization effort for both the e-Cabinet and e-Parliament systems, in turn, will help the GoSL, the Cabinet, and the Parliament reduce printing papers and ink cartridges. Also, it will reduce time and travel of courier messengers and local delivery service to physically distribute the paper documents to the Ministers and Parliament members. Therefore, significant impact on reduction of the carbon footprint is expected.

E-Cabinet: The project will support the development of the e-Cabinet system to increase efficiency in the workflow of the Cabinet Secretariat and to provide timely and adequate information to Ministers to support evidence-informed decision-making by ensuring that key information and data are more readily available. The project will finance the development of electronic document and record management system to improve clarity and accuracy of Cabinet records.

E-Parliament: The project will develop the e-Parliament system to enable communication and information exchanges between Parliamentarians, and more importantly with their constituents. The e-Parliament system will integrate relevant stakeholders and processes into an orchestrated platform to improve the time needed in the legislative process, to reduce process complexity, increase the efficiency and transparency in the Parliament's activities, to serve as a legislative knowledge hub and to promote citizen e-participation by enabling parliamentarians to publish draft plans, policies, and legislations for public consultation with their constituents.

E-Justice: The project will finance a TA to lay a blueprint to help the GoSL transition to e-Justice system to accelerate digitization and enhance efficiency of judicial services in Sierra Leone. Given the complexity and limited budget, the actual implementation of e-Justice system is not anticipated under the project.

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

This component will finance the Project proponent/implementer'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. PIU staff and the Technical Committee) to support the public sector's ability to build and retain skills for implementing whole-of-government digital transformation. Moreover, 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) support will be financed under this subcomponent and include: (a) 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; (b) 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 fed back into the implementation plan and design of project-financed systems; (c) 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 (d) surveying usage and satisfaction of users of project-financed systems and services.

Component 5: Contingent Emergency Response Component (CERC) (US$0.0 million)

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[1]. 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 population using mobile money or ensuring business 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. However, CERT component is not added to finance any activities that include adverse environmental and social risks and impacts.

III. POLICY AND REGULATORY FRAMEWORK FOR STAKEHOLDER ENGAGEMENT

3.1. Policy and regulatory framework

This section provides a summary of the existing Policy and Regulatory Framework pertaining to stakeholders' access to information and participation:

The Constitution of Sierra Leone

Section 3 of the 1991 Sierra Leone Constitution guarantees the fundamental human rights and freedoms of the individual without regard to his race, tribe, place of origin, political opinion, colour, creed or sex, which must be exercised in consonance with the rights and freedoms of others and for the public interest. Paragraph 25 of Section 3 of the constitution states that no person shall be hindered in the enjoyment of his freedom of expression including the freedom to hold opinions, receive and impart ideas as well

as information without interference which is consistent with the provisions of ESS10 on full disclosure of project information to all stakeholders.

The Local Government Act (2004) as amended in 2017

The Local Government Act, 2004 has a number of areas where stakeholder consultation is required. For example, Section 23 includes provision for local councils to be consulted by central government ministries, departments, agencies, NGOs etc., in development projects; and Section 85 (4) notes that "A local council shall, before approving or reviewing a development plan, consult residents of the locality, agencies of Government and non-governmental and international organizations that have interest in working in the locality". It is therefore expected that the PMU of the SLDTP in collaboration with the Local Councils will actively engage and consult project stakeholders especially those at the community level and other disadvantaged segments of the society.

The Environment Protection Agency Act, 2008 (as Amended in 2010)

The EPA Act, 2008 under the Third Schedule (under Section 26) describes the content of Environmental Impact Assessment (EIA) and admonishes that the EIA must report on the communities, interested parties and Government ministries consulted and by extension issues consulted on. In terms of information disclosure, a requirement of ESS10, Section 27 (1) of the Environment Protection Agency Act, 2008 stipulates that the Agency upon receiving the draft EIA report shall circulate it to professional bodies, associations, ministries and governmental organizations for their comments. Under Section 27 (2) the Agency is also required to openly display the EIA report in two consecutive issues of the Gazette as well as in the newspapers to allow for public viewing. The proponent is expected to address the comments from the general public as received through the Executive Chairman within fourteen (14) days upon receipt of the comments.

The Sierra Leone Local Content Agency Act, 2016

The Local Content Act is aimed at promoting growth and development of the domestic private sector by creating linkages with the large domestic and foreign firms through the utilization of local resources and products, and to promote the integration of the Sierra Leoneans in all economic activities. It also requires sectoral policies and projects to promote the utilization of locally available Sierra Leonean goods in the industrial and manufacturing sectors as well as support the growth of small and medium enterprises through targeted Government procurement and promote a culture of local ownership and participation in aspects of productive work.

The SLDTP is therefore envisaged to use skilled and unskilled labour mainly from local and surrounding communities. It is also anticipated that contracting and procurement for the project will be done using local resources.

Child Right Act, 2007

The 2007 Child Rights Act sets up the National Commission for Persons with Disability with the objective to ensure the well-being of persons with disability. It grants privileges inclusive of free education up to the tertiary level as well as free medical care to persons with disability. In Section 20 and 21 of the Act, is it an offence to deny a person contracts, employment opportunities and access to education on the basis disability.

This provision meets the non-discriminatory requirement outlined in ESS10. In addition, the establishment of National Commission for Persons with Disability under this Act presents a good platform for Persons with Disability seeking redress for work based or work -related grievances to access to meet the requirements of ESS 10.

The Right to Access Information Act, 2013

Being an Act to provide for the disclosure of information held by public authorities or by persons providing services for them and to provide for other related matters. This implies that the PIU is demanded by this Act to disclose all the relevant information about the project to interested stakeholders and that failure to supply information to interested stakeholders is tantamount to an offense which is liable on conviction to a fine not exceeding ten million Leones in the case of an individual and one hundred million leones in the case of a body corporate or to a term of imprisonment not exceeding six months or to both the fine and imprisonment.

National Policy on Gender Mainstreaming

The overall goal of the National Policy on Gender Mainstreaming is to mainstream gender concerns in the national development process in order to improve the social, legal, political, economic and cultural condition of the population, particularly marginalized groups. Its aim is to provide for policy makers and other actors in the development field, reference guidelines for identifying and addressing gender concerns, particularly when taking policy decisions to redress imbalances which arise from existing inequalities; to promote access to and control over economically significant resources and benefits, or to ensure the participation of both women and men in all stages of development. The SLDTP is therefore required to ensure the gender concerns that enhance the participation and engagement of men and women in its interventions.

The GBV Referral Protocol

The GBV Protocol is a technical guidance document that aims to ensure that all survivors/victims of GBV (Domestic and sexual violence) receive a prompt and comprehensive response from service providers that meets their needs from the first point of contact onwards. The protocol is in response to existing commitments by the Government of Sierra Leone such as the Poverty Reduction Strategy (PRS)- Agenda for Change, the Child Rights Act 2007, and the three Gender Acts (Domestic Violence 2007, Registration of Customary Marriage and Divorce Act, 2007 and the Devolution of Estates 2007), and other related policies.

3.2. World Bank policies and requirements

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard 10 (ESS10) "Stakeholder Engagement and Information Disclosure", identifies the importance of open and transparent engagement between the Project proponent/implementer and Project Stakeholders as an essential element of good international practice. The ESS10 establishes a systematic approach to stakeholder engagement that potentially helps the Project proponent/implementer to identify stakeholders and build and maintain a constructive relationship with them, as well as disclose information on the environmental and social risks and impacts to stakeholders in a timely, understandable, accessible and appropriate manner and format. It recommends that stakeholder engagements are commenced as early as possible in the project development process and continued throughout the lifecycle of the project. This allows for stakeholders' views to be considered in the project design and environmental and social performance. The Project proponent/implementer is also expected to implement a grievance mechanism to receive and facilitate resolution of concerns and grievances.

A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Project proponent/implementer. It must be disclosed as early as possible, and before project appraisal, and the Project proponent/implementer needs to seek the

views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Project proponent/implementer must disclose the updated SEP. According to ESS10, the Project proponent/implementer should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

IV. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

The SLDTP has been guided by stakeholder consultations carried out at the local, regional and national levels. Stakeholder engagement for the Project started from project identification (since October 2021-to date) to allow stakeholders' views and concerns to be considered in the project design. Stakeholders during the project identification and preparation stages span government institutions, private sector, the media, development partners, CSO/ NGOs, and private sector actors. Engagements included formal technical workshops, focused group discussion and informal discussions. Engagements were largely conducted using virtual platforms, emails, phone calls and smaller group meeting with the client due to adherence to precautionary measures to prevent COVID-19 infections.

Workshops were held during these periods including one on "Information on project scope, timeline, and project activities" targeted meetings were also held with women groups, Organizations with persons with disabilities (OPDs), women with disabilities, and ICT service providers for Persons with Disabilities (PWDs). These were held between December 2021 – April 2022 and had participants representing different categories of disabilities including hearing and speech, mobility and visual impairments, the media etc and staff of MIC. The workshops addressed the major challenges faced by/demands of the Persons with Disabilities (PWDs) in the following specific areas: a) Access to the Digital Services, b) Availability/accessibility of digital public services customized for PWDs, c) Digital skills (basic literacy and employability skills); and new digital services and, d) How the newly proposed project could serve the group's needs.

A summary of previous stakeholder engagements is presented in Table 1 below:

Table 1: Previous Stakeholder Engagement Activities

Stakeholder Group	Institutions	Interests and Concerns raised by stakeholders	Meeting Type and Mode of Engagement	Topic of consultations
Government Agencies	• Ministry of Finance (MOF) • Ministry of Information and Communications (MIC) • Directorate of Science, Technology and Innovation (DSTI) • National Telecommunications Commission (NATCOM) • Universal Access Development Fund (UADF) • Bank of Sierra Leone (BSL) • National revenue Authority (NRA) • National Civil Registration Authority (NCRA)	**Interests:** • Welcomed idea for the overall proposed project design as there is huge needs & demand for fast and reliable internet connection in the government offices • Looking for better utilization of existing public finance management related systems (e.g. Integrated Financial Management Information System (IFMIS), Integrated Tax Administration System (ITAS), etc.) • Looking for potential support for digital skills development/capacity building for civil servants and government employees • Looking for potential support for digitalize civil registration/digital ID • Looking for potential support for Digital Finance Services (DFS), and Finance Inclusion Agenda **Concerns:** • Current limited access to electricity in the country. How it could pose challenge on digital transformation agenda in Sierra Leone. • How high costs of data plan could be addressed or improved with the support from the project? • What would be the typical project implementation arrangements for such digital transformation project funded by the World Bank? Which Ministry will lead the project implementation (MOF or MIC or others)?	Two-day virtual Project Design Workshop with the officials from the relevant Government of Sierra Leone (GoSL) Ministries, Departments and Agencies (MDAs) to discuss the proposed project design and present global best practices in digital transformation (December 2021) Format: virtual workshop	• Presentation of the overall project concept and the proposed project design. • Presentation of global practices in digital transformation. • Sharing the current challenges in digital usage in MDAs. • Feedback from MDAs on the proposed project design • Open discussion, Q&As

Stakeholder Group	Institutions	Interests and Concerns raised by stakeholders	Meeting Type and Mode of Engagement	Topic of consultations
Government Agencies	• Ministry of Basic and Senior Secondary Education (MBSSE) • Ministry of Technical and Higher Education (MTHE)	**Interests:** • Welcomed idea for the overall proposed project design as there is huge needs & demand for fast and reliable internet connection in the government offices • Strong interests in Digital Skills Development, especially benchmark assessment work to be proposed under the project • Looking for potential support for teachers' digital literacy as well as e-learning for better teaching techniques **Concerns:** • Limited access to stable electricity at schools may hinder maximum impact of digital connectivity at schools • Selection and Priority of school connectivity (if the project supports broadband connectivity at schools) • Sustainability issue for paying recurrent costs after the project closing (if the project provides digital connectivity at schools)	Focused Topic/Theme Discussion on the Digital Skills Development Agenda in Sierra Leone and Digital School Connectivity (December 2021, January 2022) Format: Virtual meetings	• Presentation of the overall project concept and the proposed project design (Digital Skills Development & Digital Connectivity Support (potentially includes school connectivity)) • Sharing the current challenges in digital connectivity and digital skills agenda in Sierra Leone • Feedback from MBSSE and MTHE on the proposed project design • Open discussion, Q&As
Private and Public Innovation Ecosystem Providers	• DSTI • Innovation SL (private owned innovation hub) • Big Bang World (private sector currently organizing digital training with DSTI)	**Interests:** • Welcomed idea for the overall proposed project design and support for Digital Skills Development and Innovation related learning /training opportunities. **Concerns:** • Project timeline • How project details will be disclosed/informed?	Focused Topic/Theme Discussion on the Digital Skills Development and Digital Innovation Ecosystem in Sierra Leone (April 2022) Format: Virtual meetings	• Presentation of the overall project concept and the proposed project design • Sharing the current challenges in digital innovation ecosystem and job opportunities in Sierra Leone • Feedback on the proposed project design • Q&As

Stakeholder Group	Institutions	Interests and Concerns raised by stakeholders	Meeting Type and Mode of Engagement	Topic of consultations
Private sector Actors	• Mobile Network Operators (MNOs): Africell, Orange SL, QCell • Internet Service Providers (ISPs): Afcom	**Interests:** • Welcomed idea for the overall proposed project design and technical assistance (TA) support for Broadband Market/ Digital related policy, regulatory framework support activities (including Internet Exchange Point establishment TA) **Concerns:** • Project timeline • To ensure the project's support to open more private sector investment (fair competition and dynamic market)	Focused Topic/Theme Discussion on the Digital Skills Development and Digital Innovation Ecosystem in Sierra Leone (October 2021, April 2022) Format: Virtual meetings	• Presentation of the overall project concept and the proposed project design • Sharing the current challenges and opportunities in Sierra Leone • Feedback on the proposed project design • Q&As
Vulnerable Groups **(Annex for detailed summary of consultation)**	• Gender representatives (NGOs, Civil Society Representatives) • Persons with Disabilities (PWDs, Organization of Persons with Disabilities (OPDs) NGOs, special schools, providing digital literacy/skills trainings • National Youth Commission (NAYCOM)	**Interests:** • Welcomed idea for the overall proposed project design which highly mainstreaming digital inclusion agenda and Digital Skills training opportunities • Strong request to support purchase and install Assistive Technology (AT) equipment to support PWDs' access to digital contents (e.g. website reading out equipment, etc.) **Concerns:** • How and where the Digital Skills training opportunities detail will be disclosed • Potential out of pocket expense to participate in the Digital Skills Training • General Access issues (local transportation arrangement especially in rainy seasons, access to a higher floor of the building by stairs, etc.)	1.General Project Design Consultation December 2021 Virtual format with signed language interpreter 2.Focused group interviews (OPDs providing digital trainings, Women with disabilities, NGO, Civil Society representatives, NAYCOM Several meetings in March/April 2022	• Presentation of the overall project concept and the proposed project design related to Digital inclusion agenda and Digital Skills Development related activities • Sharing the current challenges and opportunities in Sierra Leone • Sharing personal experiences and perspectives (at focus group interviews) • Feedback on the proposed project design • Q&As

Stakeholder Group	Institutions	Interests and Concerns raised by stakeholders	Meeting Type and Mode of Engagement	Topic of consultations
			Virtual format with signed language interpreter in a comfortable/secure environment with facilitator (by WB Social Safeguards team)	

V. STAKEHOLDER IDENTIFICATION AND ANALYSIS

During the initial consultation activities, project stakeholders were identified, and their interests were assessed, analysed and incorporated into the design of this SEP. The identified project stakeholders are divided into a) primary stakeholders/affected parties: these are stakeholder groups who are affected or likely to be affected by the project described above; b) secondary stakeholders/other interested groups: these are stakeholder groups who may have a possibility to be involved in the project decision making related to the project or may have an interest in the project and c) vulnerable and disadvantaged groups: these are persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups.

5.1. Project Stakeholders Categories

For the purposes of an effective and well-tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

Primary Stakeholders/Affected Parties

Individuals, groups or local communities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. These will include, among others:

- Rural residents, underserved communities, businesses, women that will be reached through expansion of infrastructure and services
- Institutions targeted by capacity building activities
- Private Sector (ICT businesses, investors, business associations, etc.)
- Digital start-up businesses, ICT businesses, angel investors
- Internet service providers and other telecommunication service providers whose terms of service and customer base may be affected by the changing market conditions
- Farmers, suppliers, Micro, Small and Medium Enterprises (MSMEs) (engaged in logistics, catering and rental businesses)
- Landowners or land users along the rights of way (ROW) of the construction works whose properties or incomes may be impacted
- Residents and community members who may be inconvenienced by construction works (e.g., by noise, dust, vibration, accidental damages, access to home and other facilities)
- Business owners who may be inconvenienced and/or financially impacted by construction works

Secondary Stakeholders/Other Interested Parties

Broader stakeholders who may be able to influence the outcome of the project because of their mandate, relationship and knowledge about the affected communities or political influence. Other interested parties are individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project. They could affect the project and the process of its implementation in some way through their mandate, relationship and knowledge about the affected communities or political influence. These group of stakeholders includes ICT users in the public and private sector, investors, media, academia and civil society organizations, project contracted private and public infrastructure service companies for project implementation including telecom operators, consulting firms to implement project activities. Project supporters and donors are also project interested parties. Different stakeholder engagement groups have different interests and

influence on the project and these different levels of interest and influences will inform the form of engagement to be undertaken throughout the project cycle. These will include, among others:

- All users of broadband services in rural areas, on account of improvements in affordability and reliability of broadband services
- Line Ministries, public agencies, and their regional offices, providing public services
- International organizations who implement projects in the targeted areas
- Civil society organizations (CSOs) and NGOs working on environmental and social policy issues, gender, disability, etc.
- Media

Vulnerable Individuals or Groups

Some project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups. They often do not have a voice to express their concerns or understand the impacts of a project due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. These include among others:

- Women;
- Youth;
- Elderly;
- Persons with disabilities.
- Low-income households;
- Hard to reach rural communities

5.2 Methodology

The following principles for stakeholder engagement shall be applied to ensure best practices are followed in the determination of stakeholders.

- *Openness and life-cycle approach*: Public consultations for the SLDTP will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation.
- *Informed participation and feedback*: Adequate information will be provided to and widely distributed among all stakeholders in an appropriate format. Opportunities will be provided for communicating stakeholders' feedback as well as analyzing and addressing their comments and concerns.
- *Inclusiveness and sensitivity*: Stakeholder inclusivity shall be given adequate attention so as to build effective relationships and trust. All stakeholders at all times would be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Vulnerable groups as well as the excluded such as women, youth, elderly and persons with disability are to be given special attention within the context of the appropriate cultural sensitivities of those concern.

5.3. Stakeholder Analysis

This section identifies key stakeholders, including individuals, groups, or communities who will be affected or who have an interest, and who will be informed and consulted about the project. It also identifies and assesses the needs of some disadvantaged or vulnerable individuals or groups, who may have limitations in participating and/ or in understanding the project information or in participating in the consultation process.

Table 2: Description of SLDTP Stakeholders

Stakeholders	Description	Roles and Interests	Engagement Technique
Project Affected Stakeholders	MDAs, Institutions, secondary cities, offices, youth, community centres	Receive capacity building, improve ICT services to end users, improve quality of education and health services, improve communication, improve governance through e-services Geographic targeting criteria, availability of infrastructure, adequacy of facilities for service (eg. computer), digital skills training	Virtual Meetings, Face-to-face Meetings, Focused group meetings
	Internet Service Providers	Technical support, improve and provide internet services, receive related capacity building	Virtual Meetings, Face-to-face Meetings,
	Start-ups Entrepreneurs Investors ICT businesses	Access financial and technical support and facilities for ICT start up and investment, access support for digital devices and outreach activities, availability of facilities for start-ups Expand business opportunities Outreach and information dissemination on the competition, transparency, selection process, assistance for participants from remote areas, language barriers,	Virtual Meetings, Face-to-face Meetings, Written information
	Farmers, suppliers, MSMEs	Identify new business opportunities, digital skills training, access to information about the services, availability of infrastructure, risk of fraud and theft	Focused group meetings, TV, Radio, Verbal, Community announcement, Local media
Other interested Stakeholders	Line Ministries, public agencies, and their regional offices, providing public services	Digital skills training, access to information, public awareness on ICT, availability of infrastructure, adequacy of facilities for service	Virtual Meetings, Face-to-face Meetings, Written information
	Private Sector (ICT businesses, investors, business associations)	Access to information on project activities, new opportunities in the ICT market, regulatory constraints, synergy with financial and other sectors, digital skills improvement, improvement in government services	Virtual Meetings, Face-to-face Meetings, Written information
	Civil society (NGOs working on environmental and social policy issues, gender, disability, etc.)	Equity, affordability of services, open data and access to information, public awareness on ICT, ethical issues in use of ICT, fraud and cyber security, accessibility of services to persons with disability, digital skill gaps	Virtual Meetings, Face-to-face Meetings, Focused group meetings, Written information

	Media (private and public)	Project information, awareness, policy and regulatory issues, transparency,	Virtual Meetings, Face-to-face Meetings, Focused group meetings, Written information
Vulnerable individuals or groups	Women, youth, elderly, persons with disabilities, low-income households, hard to reach rural communities	Accessibility of services, affordability, geographic targeting, digital skills training, selection criteria for training, cultural norms constraining access to digital technologies, risk of fraud and theft	Virtual Meetings, Face-to-face Meetings, Focused group meetings

Based on this assessment including stakeholder requirements/ needs and interests, the table below categorizes stakeholders by their levels of influence and impact in the project. The stakeholder list is a "living document" which will be updated regularly throughout the project life as appropriate.

Table 3: List of Affected Stakeholders and Level of Impact

	Level of Impact		
Type of Stakeholder	**High Impact[10]**	**Medium Impact[11]**	**Low Impact[12]**
Affected	**Key Actors** • Ministry of Finance • Ministry of Planning & Economic Development • Ministry of Tertiary and Higher Education • Ministry of Basic & Senior Secondary Education • Ministry of Health and Sanitation • Ministry of Agriculture and Food Security • Directorate of Science, Technology and Innovation (DSTI) • National Telecommunications Commission (NATCOMH) • Universal Access Development Fund (UADF) • Environmental Protection Agency • National Investment Board • Internet Service Providers	• National Revenue Authority (NRA) • National Civil Registration Authority (NCRA) • Bank of Sierra Leone (BSL) • Statistical Office Sierra Leone (STATSL) • National Monitoring and Evaluation Directorate • Ministries, Departments, and Agencies (MDAs)	**• Parliament**

[10] Primary/direct stakeholders (key actors and beneficiaries), having high interest, power and influence on the success of the project.

[11] Direct/indirect stakeholders with an interest and influence on the success of the project

[12] Secondary/indirect stakeholders who are likely to have minimal influence and less directly affected

	• Mobile Network Operators (MNOs) **End Users** • Service users • Start-ups • Students and pupils • Small Medium Enterprises (SMEs) • Youth, women and people with disabilities		

Other Interested	• Development Partners • Office of the President (Cabinet) • Financial Institutions • Ministry of Justice and Attorney-General's Department • Social Protection Sector Working Group (development partners, CSOs, private sector and academia)	• Parliament • Media • Traditional leaders	• Civil Society Organizations (CSOs) • Non-Governmental Organizations (NGOs) • Contracted Third Parties

Vulnerable	• Communities in underserved regions • Rural residents • Persons with Disabilities (PWDs) • Women • Elderly Youth • Low-income households

Table 4 below also identifies and assesses the needs of some disadvantaged or vulnerable individuals or groups to help determine suitable engagement strategies.

Table 4: Characterization and needs of Vulnerable Groups

Stakeholder group	Key Characteristics	Language needs	Preferred notification	Specific needs
Communities in underserved regions	Low access to infrastructure, distance, seasonal mobility	Local languages	Local media, local community leaders, Marketplaces Community Information Centres Information vans	Distance to meeting venue, travel costs
Hard to reach and Rural residents	Low access to infrastructure High poverty level	Local languages	Local media, community structures and local administration Schools, Churches, Mosques and health centres	Local travel distance and travel cost

Persons with disabilities (PWDs)	Hearing impairment (Hearing loss) Visual impairment (Low vision or blindness) Physical impairment (Mobility disabilities) Speech impairment, amongst others	Braille, audio, sign language	Written information, community announcement, focused group meetings, TV, Radio etc.	Accessible training venues, including use of sign language translators/ interpreters, braille formats/ large prints
Women	Consultation times and location will have to align with their needs. May require childcare for meetings or other additional	Local languages	Verbal, community announcement, focused group meetings etc	Meetings in close-by locations within communities Gender sensitive teaching
Stakeholder group	**Key Characteristics**	**Language needs**	**Preferred notification**	**Specific needs**
	support and resources to enable them to participate in consultations.			and learning environments Accessible grievance redress system

Elderly and Youth	Limited voice	Preferred languages	Focus group meetings; Verbal, community announcement, media	Address special needs to support them to understand the project impacts and benefits.
Low-income households	Low access to infrastructure Limited voice	Preferred languages	Focus group meetings; Verbal, community announcement, media	Address special needs to support them to understand the project impacts and benefits.

VI. STAKEHOLDER ENGAGEMENT PROGRAM

6.1 Purpose and Timing of Stakeholder Engagement Program

This Stakeholder Engagement Plan (SEP) is designed to establish an effective platform for productive interaction with the potentially affected parties and others with interest in the implementation outcome of the Sierra Leone Digital Transformation Project. Meaningful stakeholder engagement throughout the project cycle will:

- Inform stakeholders about project objectives, scope and manage expectations
- Solicit feedback to inform project design, implementation, monitoring and evaluation
- Assess and mitigate project environmental and social risks
- Enhance project outcomes and benefits
- Build constituencies and collaboration
- Disseminate project information/ materials
- Receive and address project-related grievances

Adequate stakeholder consultations will require effective timing and advanced planning. To ensure information is readily accessible to affected stakeholders, and adequate representation and participation of the different groups in the process, the Project Implementation Partners will adopt different methods and techniques based on an assessment of stakeholder needs.

6.2. Proposed strategies for consultation

The main goal of the stakeholder engagement plan is to ensure that project stakeholders are consulted, and their concerns and issues are considered in project design, implementation and monitoring and evaluation. The stakeholder consultation for the project aims to create awareness and increase understanding, improve project decisions making, mobilize support and forge collaboration and clarify roles and responsibilities. Stakeholder consultations will serve as a platform for the dissemination of project information and receive feedback.

Detailed records of all public consultations will be kept. Minutes should be supported with photo material taken during consultation and lists of attendees with their contact information and original signatures.

Stakeholder engagement that started at project concept will continue throughout the project cycle. The sequencing of the project components makes it possible for stakeholders to provide input into assessments, studies and decision-making processes.

- **Project launch:** The MIC and implementing partners will organize a project launch workshop. The purpose of the launch workshop is to clarify the roles and responsibilities, implementation arrangements, project time frame and sequencing, the prioritization of activities. The event will be accompanied by disclosure of key project documents and other relevant documents (strategies and regulations).
- **Project implementation:** Periodic review of project implementation (bi-annual) will be conducted at the national level and regional levels with stakeholders. Implementing agencies and partners share information on the overall project progress with stakeholders, lay out the plans for a subsequent period and receive feedback and recommendations.
- **Project evaluation:** Project stakeholders will be engaged in both baseline data collection, midterm and end line project evaluation activities based on the results framework for the project.

- **Project closing:** Stakeholder consultation on project closure and post closure concerns are also considered at the end of the project to inform project achievements, share lessons learnt and make recommendations for possible future engagements.

6.3. COVID-19 and Restriction of Public Gatherings

Considering the current COVID-19 situation, different ways of consultation and information disclosure could be necessary to minimize risks. The following are examples of methods that could be considered as alternative methods of consultations that may be adopted during restriction of public gatherings:

- Virtual meetings to discuss details of the project can be held for stakeholders
- In the case where some stakeholders cannot join virtual meeting, information on project can translated into a short video and shared via appropriate media platforms. The video could present the objectives of the project and the main risks and benefits.
- Project related documents link to be shared on the client website for stakeholders that can access websites
- Conduct interviews by phone - especially for people who do not have Internet access.

6.4. Guidance on Conducting Virtual Consultations

Online meetings shall observe protocols similar to face-to-face meetings:

- Identify participants to be included in the invitation. Meetings shall be based on a stakeholder analysis. The E&S Specialist will identify which stakeholders are relevant but may have challenges accessing the format of the meeting proposed. He or She will also identify which medium works best for them (e.g., phone-calls) and engage with them using that medium.
- Send invitations ahead of the meeting. Use an accessible medium (email, phone, WhatsApp, etc.) to send invitations. Invitations shall be sent well in advance and at least seven days prior to the meeting.
- Register participants by doing a rollcall or registering online.
- Distribute material prior to meeting. This may include the agenda, project documents, presentations, questionnaires and discussion topics. These can be sent, for example, by email, courier or WhatsApp prior to the meeting (at least seven days prior).
- Provide technical support. The consultations team shall provide technical support to the participants during the virtual consultations, particularly in terms of connection options (e.g., possibility of being called in instead of opting for a connection requiring internet).
- Ensure appropriate opportunities for discussion and feedback. Participants can be organized and assigned to different topic groups by being in smaller chatgroups, or by having smaller virtual sessions. Feedback can also be provided through an electronic questionnaire or feedback forms that can be emailed to the team.
- Share the conclusions and summary of the meeting. The chair of the meeting should summarize the virtual workshop discussion, formulate conclusions and share with all participants in an accessible medium.
- Document the meeting just as you would a face-to-face meeting. As with a face-to-face meeting, ensure that the meeting is well-documented, including information on how stakeholders were identified, how invitations were sent out, how the meeting was held and measures taken to ensure that the meeting was accessible, what issues were raised and how the responses to the issues. It will be important to document in detail the processes such as invitations, online platforms, accessibility, etc.

6.5. Proposed strategy for information disclosure

The project strategies for information disclosure will be tailored to the different stakeholders. Appropriate formats and methods of disclosure and information sharing will be used. A central/national depository of all disclosed information will be maintained with the project implementing agency website. Information on the different project components will be disclosed on the websites of the respective project implementing partners. Other means of communication including print media, radio, television, public events, brochures, fliers, and social media will be used. In summary, various methods for stakeholder engagement that the Project will leverage are listed in Table 5 below.

Table 5: Sierra Leone Digital Transformation Project Stakeholder Engagement Methods

Engagement Technique	Description and use	Target audience
Websites	The Project PAD and PIM, as well as the ESMF and SEP, will be published on official websites of partnering and implementing Ministries and Agencies and the World Bank.	All stakeholders
Media Announcements	Advance announcements of commencement of major project activities, project Grievance Redress Mechanism, and other outreach needs of the project, e.g., call for skills training, sensitization.	Project-affected stakeholders and communities
Printed media advertisement	This will be used to disseminate and disclose project documents intended for general readers and audience (e.g. ESMF, RPF, ESCP). Advertise project procurements, as applicable.	General public
Community Meetings/ Information Centre and Information Boards	These interactive platforms will be used to convey general information on the Project, detailed discussions on sub-project activity that is planned by the project, project environmental and social risks and mitigation measures, and to provide regular updates on implementation progress to local, regional and national stakeholders Advance announcement of commencement and progress of major project activities	Project-affected communities
Correspondence by phone/ email/ written letters	Distribute project information to government officials, organizations, agencies and companies and invite stakeholders to meetings.	Government officials, NGOs, CSOs, CBOs, trade associations, Development Partners
Distribution of printed public materials: Project information leaflets, brochures, fact sheets	This will be used to convey general information on the Project and to provide regular updates on its progress to local, regional and national stakeholders.	General public
Internet/ Digital Media	Use of the official websites of partnering and implementing Ministries and Agencies to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public	Project stakeholders and other interested parties that have access to internet resources.
One-on-one interviews	This will be used to solicit views and opinions on project impacts and solutions.	Project beneficiaries and non-beneficiaries, vulnerable individuals, Persons with Disability (PWDs), other

Engagement Technique	Description and use	Target audience
		marginalized groups, CSOs, NGOs, DPs etc.
Dedicated hotline and short code for SMS	A designated and manned telephone line and short code will be set up that can be used by the public to make complaints and grievances, obtain information, make enquiries, or provide feedback on the Project.	Project affected persons, and any other stakeholders and interested parties
Workshops	This channel will be used to: (i) Present project information to a group of stakeholders; (ii) Allow the group of stakeholders to provide their views and opinions; (iii) Use participatory exercises to facilitate group discussions, brainstorm issues, analyze information, and develop recommendations and strategies; and (iv) Recording of responses.	Government, NGOs, CSOs, DPs, Private Sector Associations
Focus group meetings	This will be used to facilitate discussion on specific issues such as GBV, disability inclusion, etc. that merit collective examination with various groups of stakeholders using Focus Group Meetings.	Vulnerable groups, Persons with Disability (PWDs) and other marginalized groups
Surveys / Independent evaluations	Surveys will be used to gather beneficiary opinions and views about project interventions. CSOs could also be engaged to support citizen feedback surveys for the project.	Project beneficiaries

The proposed framework for consultation and information disclosure at each project phase is summarized in Table 6 below.

Table 6: Project Strategy for Consultation and Information Disclosure

Project stage	List of information to be disclosed	Method proposed	Timetable: Location	Target Stakeholders	Topic of consultation	Responsibility	Proposed Time Schedule
Preparation/ Design phase	Project Appraisal Document (PAD)	Official websites	Project duration MIC,	International, National, Regional and district stakeholders	Project design, benefits and impact	MIC, Project Coordination Unit	2022
	ESMF, SEP	Newspaper publications	Once in 2 national daily newspapers	National, Regional and district stakeholders	Environmental and Social Management, Procurement, stakeholder engagement	MIC, Project Coordination Unit	
		Workshops	3 workshops –	Regional, District and community level	Project concept, Mode of selection of subprojects, benefits, impacts	MIC, Project Coordination Unit	
		Community durbars and Consultation with affected parties	Community Information Centers	Community Level stakeholders	Project concept, Mode of selection of subprojects, benefits, impacts	MIC, Project Coordination Unit	
		Distribution of printed documents in relevant institution	Community Information Centers	National, Regional and district stakeholders Community level	Project concept, benefits and impacts	MIC, Project Coordination Unit	

Project stage	List of information to be disclosed	Method proposed	Timetable: Location	Target Stakeholders	Topic of consultation	Responsibility	Proposed Time Schedule
Implementation Phase	Project design and implementation	Project inception stakeholder meetings	National, regions and districts	Project staff, beneficiary communities	Project concept and implementation modalities	Project Coordination Unit	2022-2027
	Project progress reports	Annual/mid-year project stakeholder meetings	National, regions and districts	Beneficiary communities	Project progress	MIC, Project Coordination Unit	
	Marketing and communication of training programme	Community Durbars, Newspaper publications, Radio adverts	Community Information Centres, Workshops	Beneficiary communities	Project concept and implementation modalities	MIC, Project Coordination Unit	
	Sensitization on Digital Innovation Fund	Traditional media, Social media	National, regions and districts	Beneficiary communities	Digital Innovation Fund	MIC, Project Coordination Unit	
	ESMPs, LMP, OHS Plan, RAPs/ARAPs, Emergency preparedness and response Project Monitoring and safeguard compliance report	Official websites Community Information Centres Face-to-face Meeting		International, National, Regional and district stakeholders	Subprojects benefits, impacts (Community health and Safety, Occupational health and Safety, Labour Management Procedures, Security, GRM, GBV issues and mitigation	MIC, Project Coordination Unit	

Project stage	List of information to be disclosed	Method proposed	Timetable: Location	Target Stakeholders	Topic of consultation	Responsibility	Proposed Time Schedule
	Safety and health survey at project sites and beneficiary establishments	Community	Project communities	Beneficiary communities	Occupational health and safety	MIC, Project Coordination Unit	
	Annual Sector Performance reports Environmental and Social Audit reports Updates on project activities	Implementation progress reports Audit reports		Regional and district stakeholders	Performance of Training Service Providers, grants, job connections, GRM, Security, GBV education	MIC, Project Coordination Unit	
Completion Phase	Project Completion Report	Implementation completion reports	MIC	All Stakeholders	Project results	MIC, Project Coordination Unit	2027

6.6. Strategy for engagement of disadvantaged and vulnerable groups

The principle of inclusiveness will guide the stakeholder's engagement, particularly with respect to vulnerable individuals and groups. The project will make reasonable provisions to cater for representation from remote areas, persons with limited physical abilities, vision, hearing and speech impairment amongst others, and those with insufficient financial and transportation means to attend public meetings scheduled by the Project. In cases where vulnerable status may lead to people's reluctance or physical incapacity to participate in large-scale community meetings, the project will hold separate small group discussions with them at an easily accessible venue. This way, the project will reach out to groups who, under normal circumstances, may be insufficiently represented at general community gatherings. Some strategies to be adopted to reach out to these groups include:

- Identifying leaders of vulnerable and marginalized groups to reach-out to these groups
- Maintaining information flow through existing disability associations and maintaining a database of marginalized groups (National Commission for Persons with Disabilities)
- Including disability considerations in beneficiary selection and targeting criteria
- Ensuring easy and safe access to subproject sites and training venues
- Providing disability friendly training materials
- Ensuring GBV codes of conduct and monitoring mechanisms are in place
- Leveraging existing social protection projects which include vulnerable populations and use their systems to identify and engage them
- Engaging community leaders, CSOs and NGOs working with vulnerable groups.

6.7. Review of stakeholder comments

Upon disclosure of project information and for information disclosed through meetings, instant feedback will be collected through designated representatives who will be available during the meetings. Participating stakeholders shall also be given the freedom to take their own minutes of the proceedings and share a copy with the representatives.

The project will commission survey at twice during the life span of the project and receive feedback on various aspects of the project from the targeted project stakeholders, vulnerable and disadvantaged groups and the general public and integrate the result into the project annual planning and review cycle. The results of the surveys will be disclosed through the MIC and World Bank websites and other medium.

VII. RESOURCING AND RESPONSIBILITIES FOR IMPLEMENTATING PLANNED ACTIVITIES

This section provides estimates of resources required for implementation and responsible agencies. Implementation and monitoring of the SEP and all other Environmental and Social Standards (ESS) instruments will be the responsibility of the PCU in the MIC. The PIU under the MIC will be responsible for the implementation of the SEP in collaboration with key implementers. The SEP will be coordinated by the Environmental and Social Safeguards Specialist within the PIU of MIC and in collaboration with focal persons in implementing partners. The technical assistance (TA) under component 4 of the project has dedicated resources for assessment of the institutional capacity of the relevant institutions and capacity development needs for managing environmental and social risk management.

7.1 Roles and responsibilities in the implementation of the SEP

The project is multi-sectoral, with multiple ministries and agencies participating on project activities implementation. Therefore, the overall institutional arrangements for coordinating, overseeing, and managing project SEP strategies and activities will involve the following:

i. **Project Coordination Unit (PCU):** Managed by the Ministry of Information and Communication (MIC). The primary functions of the unit will be to (i) convene and support oversight committee meetings; (ii) prepare consolidated project status, progress, and performance reports for the oversight committee and the Bank; (iii) coordinate across implementing and partnering ministries and agencies; and (iv) undertake due diligence and ensure quality assurance of, and accountability for, project implementation, including financial management, procurement, and safeguards. The PCU is led by the Project Coordinator who will have overall responsibility for implementing the SEP, including leading consultations with key stakeholder groups such as affected communities private sector actors. The PCU will establish and operate central function of the project implementation including financial management, procurement, safeguards, monitoring and evaluation, capacity development and technical assistance, and research and analysis. These Specialists will have specific responsibilities in implementing aspects of the SEP. A summary of key institutions and or Focal Persons and their responsibilities is presented below.

ii. Project Steering Committee: The primary function of this committee would be to review project status, progress, and performance, to help ensure inter-ministry and inter-agency cooperation, and to resolve any outstanding project implementation issues.

iii. Project **Technical implementation Agencies and Beneficiary Agencies:** The main agency for the project is MIC. Technical Implementation Agencies will primarily be responsible for leading and technical aspects of the respective project implementation.

A summary of key institutions and or Focal Persons and their responsibilities is presented below.

The key roles responsibilities for the implementation of the SEP are provided in Table 7 below;

Table 7: Key Institutions/Focal Persons and their Responsibilities

Institutions/ Focal persons/ Unit	Responsibilities
Project Steering Committee	▪ Oversight responsibility for entire project implementation
Project Coordination Unit	▪ Overall Coordination ▪ Manage and implement the Stakeholder Engagement Plan (SEP) ▪ Dissemination of project information
Environmental and Social Specialist at the PIU	▪ Facilitate and monitor implementation of the SEP ▪ Incorporate SEP guidelines in contractors' agreement ▪ Organize and conduct national and district level training ▪ Develop manuals and modules for capacity building and awareness creation ▪ Facilitate monitoring and coordinate monitoring activities ▪ Develop and ensure effective implementation of Grievance Redress Mechanism (GRM)

	▪ Liaise with relevant institutions on environmental and social issues ▪ Ensure provisions for gender inclusion and GRM under the SEP are implemented effectively ▪ Interface with stakeholders and respond to comments or questions about the project or consultation process. ▪ Provide contact information if stakeholders have questions or comments about the project or consultation process. ▪ Document any interactions with external stakeholders. ▪ Maintain database, records for SEP ▪ Coordinating public meetings, workshops, focus groups etc. ▪ Makes sure the SEP is being adhered to and followed correctly. ▪ Raise awareness of the SEP among project implementation unit, employees contracted firms and relevant external stakeholders ▪ Deliver information to stakeholders on complaint mechanism and procedures of the SEP
Training Service Providers	▪ Provide Competency-Based Training for Apprentices and Master craft persons ▪ Comply with all E&S issues
Communication Specialist	▪ Lead all communication activities related to the project and ensure information reaches all stakeholders and affected groups in a timely and accurate manner
Contractors/ Sub-contractors	▪ Follow and comply with all, E&S guidelines and keep records of E&S on site

7.2 Estimated SEP budget

The project will allocate sufficient funds to implement the SEP. The SEP implementation will be included as part of project cost under sub-component 4 which would fund all Technical Assistance (TA) and communication strategies planned to be undertaken during various stages of the project. The budget for implementing the SEP is estimated at **USD 650,000**, below as detailed in Table 8.

Table 8: Estimated SEP Budget

Activities	Number	Unit Cost (USD)	No. of years	Total Cost (USD)
Project launch workshops	1	30,000.00	1	30,000.00
Consultation meetings	3	10,000.00	5	150,000.00
Training Activities	3	10,000.00	5	150,000.00

Production and dissemination of communication material	10	5,000.00	3	150,000.00
Travel Expenses for Staff	15	2,000.00	5	150,000.00
GRM Implementation	-	-	-	20.000.00
Total				**650,000.00**

VIII. GRIEVANCE REDRESS MECHANISM (GRM)

The main objective of a Grievance Redress Mechanism (GRM) is to assist an SLDTP to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved with the project. The GRM is an integral part of the SEP 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

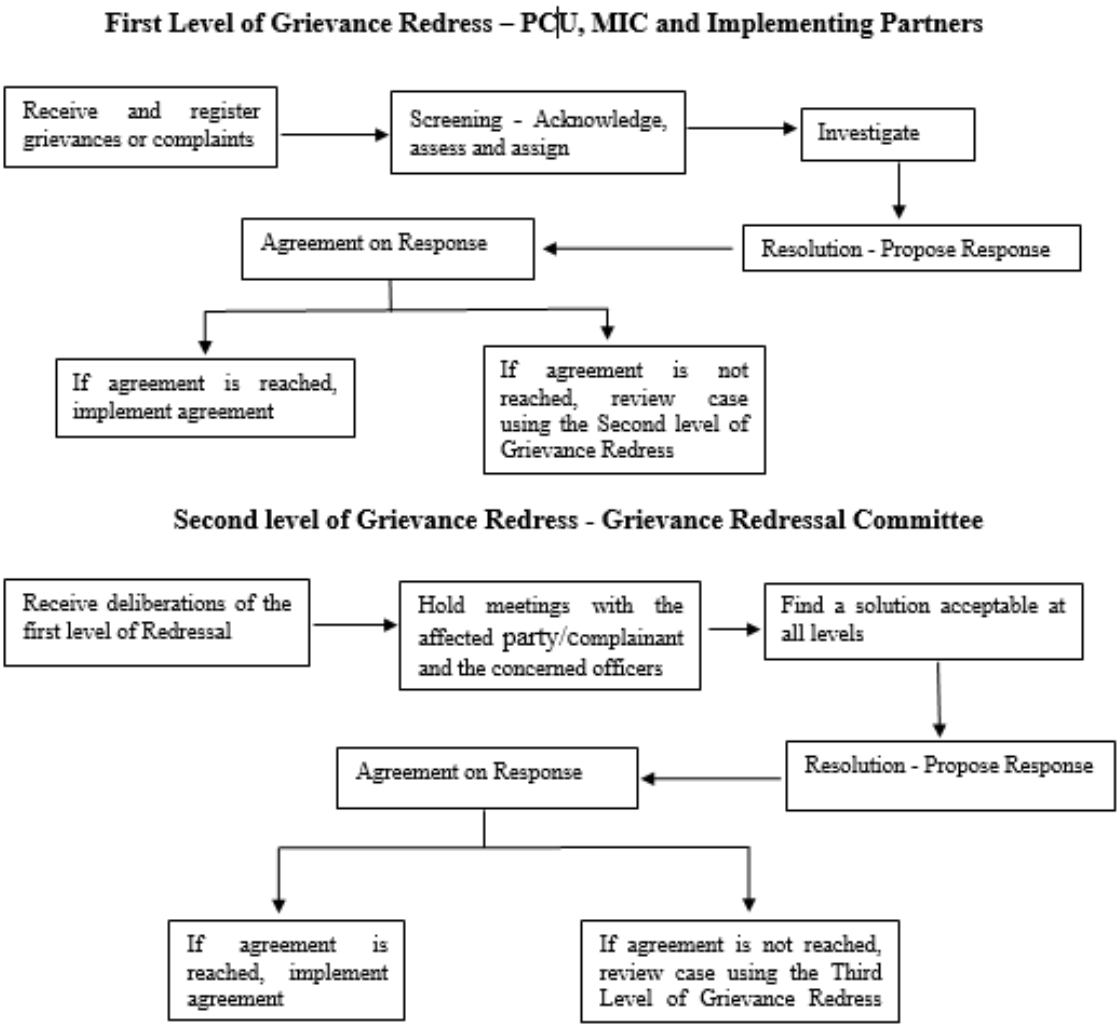
- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of the projects:
- Ensures that appropriate, timely and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids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

Having multiple stakeholders on board the project could lead to complaints, miscommunications, misconceptions, misunderstandings, conflicts and disputes. The project will provide 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. 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. The following table describes level the GRM in the SLDTP;

8.1 Proposed grievance redress mechanism

The GRM steps are illustrated in Figure 1.



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 PIU 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 below:

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 PIU/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 PIU 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/PIU as to their scale and scope.

The project coordinator at the PIU 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 PIU 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. (see Annex 2 for samples of GRM forms).

8.2 SEA/SH Related Grievance Redress Mechanism

When a 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/SH 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/SH 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 GBV-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-Centered Approach: All prevention and responses action will need to balance the respect for due process with the requirements of a survivor-centered approach in which the survivor's choices, needs, safety, and wellbeing remain at the center 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.

8.3 Building GRM awareness

The 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 Redress Mechanism and GBV 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 Redress 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; various mediums will be used- as detailed in previous sections of the SEP. The GRM will also be published on the MIC website and those of the implementing partners and the project website or Facebook page if there is one. A project notice board will be erected on the sites of sub-projects indicating the existence of the mechanism and a phone number, email and address for further information. The GRM will be translated into local languages if needed.

8.4 Recommended GRM timeframe

The table below 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 10: Proposed GRM timeframe

Step	Process	Time frame for each step
1	Receive and register grievance	within 24 hours
2	Acknowledge	within 24 hours
3	Assess grievance	Within 1 Day

4	Assign responsibility	Within 1 Day
5	Development of response	within 14 Days
6	Implementation of response if agreement is reached	within 21 Days
7	Close grievance	within 30 Days
8	Initiate appeal process if no agreement is reached at the first instance	within 5 Days
9	Mediation through appeal	within 10 Days
10	Implement review recommendation and close grievance	Within 21 Days
11	Grievance taken to court by complainant	As applicable based on the country's judicial processes

8.4 GRM documentation and reporting

Resolved and escalated grievances/cases would be documented daily (as tickets) into the centralized GRM system by the assigned grievance managers at the PIU. The Environmental and Social Safeguards Specialist would exercise oversight over the system and track the resolution of all grievances/cases.

Monthly case/ grievance reports will be generated from the system by the Environmental and Social Safeguards Specialist at the PIU and reported to the Project Coordinator to inform management decisions. Quarterly reports will also be generated and reported to the MIC as part of the Project's Progress Reporting to the World Bank. Periodic reports will also be generated within a reasonable time frame for stakeholders upon request irrespective of the period (e.g. bi-annual, annual etc.)

The following indicators could be used for monitoring purposes:

- Number of active project complaints and appeals recorded and reported in each institution
- % of grievance redressed claims settled within the specified period
- % of unresolved complaints or disputes during the monitoring period
- Comments received by government authorities, women & youth, family, community leaders and other parties and passed to the Project

IX. MONITORING AND REPORTING

Monitoring and Tracking of Stakeholder Engagement is vital to the project to ensure effective continuous engagement and follow-up and to minimize slippages and oversight of important engagements. The Project Coordinator will maintain a Stakeholder Engagement Log that records all stakeholder engagement undertaken or planned. The Engagement Log includes location and dates of meetings, workshops, and discussions, outcomes and a description of the project-affected parties and other stakeholders consulted. Monitoring reports presented to the Inter-Ministerial Committee will include Stakeholder Engagement Logs as well as feedback from the GRM. It may also include for instance, how the project implementation agency responded to the concerns raised, how these responses

were conveyed back to those consulted, details of outstanding issues and any planned follow up. There will be annual reporting of the SEP as part of the project monitoring report.

The Project will also develop an evaluation form to assess the effectiveness of every formal engagement process. The questions will be designed as appropriate for the relevant audience.

9.1 Involvement of stakeholders in monitoring activities

The implementation of the SEP will be overseen by implementing agencies responsible for each component of the project. The Environmental and Social Safeguards Specialists in the partnering ministries and implementation agencies will monitor the Stakeholder Engagement Plan (SEP) in accordance with the requirements of the legal agreement. The team will monitor and document any commitments or actions agreed during consultations, including changes resulting from changes in the design of the project or the SEP.

Data for monitoring of beneficiaries, enterprises, associations and cooperatives, training providers and all other persons with project implementation roles will be gathered through self-reporting, from the be development partners, including the private sector following a schedule and using standardized forms and procedures. Information from these beneficiaries will also be collected through monitoring visits by assigned staff from implementing and partnering ministries and agencies. In addition to the monitoring responsibilities by the PIU and the respective implementing and partnering ministries and agencies, independent third parties will also be engaged periodically to monitor progress and performance on the project. The indicators to be monitored will include level of understanding of the programme stakeholders, annual grievance received and resolved, level of involvement of affected people among others.

9.2 Reporting back to stakeholder groups

Through the project's planned communication channels, results of the project will be disseminated to stakeholders at the national and sub-national levels. The PIU through its Safeguards Specialist or a dedicated staff will provide the opportunity to report back to the communities on matters relating to the following:

- Main findings from the consultations conducted at sub-project feasibility, design and implementation
- Progress on implementation of the ESMP
- Progress on the SEP implementation and grievance management
- Sharing of Project implementation process reports (available at PIUs, copies to stakeholders, etc.)

X. ANNEXES

i. Interview checklist and guidelines



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ii. Report on stakeholder consultations workshops



2021-12-16- PWDs
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2022-04-12 - WWDs
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iii. GRM forms



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