

**REPUBLIC OF THE GAMBIA**



**Public Administration Modernization Project  
(PAMP) for Citizen Centric Service Delivery  
(P176924):**

**Stakeholder Engagement Plan (SEP)**

**Final Report**

**May 8, 2023**

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## Abbreviations and Acronym

CE	Citizen Engagement
CSO	Civil Society Organization
COVID-19	Coronavirus Disease 2019
DPPP& PE	Directorate of Public and Private Partnership and Public Enterprise
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
EU	European Union
FGD	Focus Group Discussion
FLAG	Female Lawyers Association-Gambia
GBA	Greater Banjul Area
GBV	Gender Based Violence
GFMD	Gambia Fiscal Management Development Project
GM	Grievance Mechanism
GoTG	Government of The Gambia
GRA	Gambia Revenue Authority
GRC	Grievance Resolution Committee
GWCC	Gambia Women’s Chamber of Commerce
HR	Human Resources
HRMIS	Human Resources Management Information System
IAD	Internal Audit Directorate
IMF	International Monetary Fund
IPSAS	International Public Sector Accounting Standards
IT	Information Technology
ITAS	Integrated Tax Administration System
KII	Key Informant Interview
KMC	Kanifing Municipal Council
KPI	Key Performance Indicators
LGA	Local Government Authorities
MOFEA	Ministry of Finance and Economic Affairs
MOGCSW	Ministry of Gender, Children and Social Welfare
MPA	Ministry of Public Service, Administrative Reform, Policy Coordination and Delivery
M&E	Monitoring & Evaluation
NAO	National Audit Office
NGO	Non- Government Organization
NID	National Identification
PAD	Project Appraisal Document
PAMP	Public Administration Modernization Project
PAP	Project Affected Person
PDO	Project Development Objective
PIM	Project Implementation Manual

PIU	Project Implementation Unit
PTA	Parent Teachers Association
PSC	Project Steering Committee
SSCT	Sexual Exploitation and Abuse/Sexual Harassment Compliance Team
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SOE	State Owned Enterprises
STD	Sexually Transmitted Diseases
TANGO	The Association of Non-Government Organization
TTL	Task Team Leader
TPD	Tax Policy Directorate
UNDP	United Nations Development Program
WB	World Bank
WDC	Ward development Committee

## GLOSSARY OF KEY TERMS

**Consultation:** The process of gathering information or advice from stakeholders and considering these views when making project decisions and/or setting targets and defining strategies.

**Engagement:** A process in which a company builds and maintains constructive and sustainable relationships with stakeholders affected over the life of a project. This is part of a broader “stakeholder engagement” strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the Project.

**Grievance Mechanism:** A process for receiving, evaluating, and addressing project-related complaints and guidance from citizens, stakeholders, and other affected or non-affected communities.

**Stakeholders:** Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively.

**Stakeholder Engagement Plan:** A plan, which assists investors with effectively engaging with stakeholders throughout the life of the project and specifying activities that to be implemented to manage or enhance engagement.

**Complainant:** An individual, group, association, or organization that submits a verbal or written complaint

**Grievance/Complaint:** - an expression of dissatisfaction that stems from real or perceived issues, typically referring to a specific source of concern and/or seeking a specific solution. For this GM, real and perceived impacts are treated equally and given the same due treatment. The term grievance and complaint are used interchangeably in this document.

**Sexual exploitation:** any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

**Sexual abuse:** actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

**Sexual harassment:** Any unwelcome sexual advances, request for sexual favors, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that may be reasonably expected or perceived to cause offense or humiliation to another when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile, or offensive work environment.

**Survivor:** A survivor is a person who has experienced the SEA/SH incident in the context of this GM

**Vulnerable Groups:** Individuals and groups, who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, sexual orientation and gender identity, or social status may be more adversely affected by a Project than others and who may be limited in their ability to claim or take advantage of development benefits

## CHAPTER 1: Project Description and COMPONENTS

The Government of The Gambia is to receive financial support from the World Bank to develop and implement the Public Administration Modernization Project (PAMP) for Citizen Centric Service Delivery (P176924). The Project Development Objective (PDO) is “to improve government oversight of fiscal and human resources as well as mechanisms for citizen engagement in selected service delivery sectors.” The Ministry of Finance will implement the project through the PIU

### 1.1 Project components

The project has four potential components as summarized below.

**Component 1: Enhancing Oversight of Public Fiscal Resources:** The objective of this component is to address weaknesses in the oversight of public revenues and expenditures. This objective will be supported through the deployment of an Integrated Tax Administration System (ITAS) within the Gambia Revenue Authority (GRA) as well as by providing support to the Tax Policy Directorate (TPD) to better design and administer tax policy. Additional support will be provided to the National Audit Office (NAO), Accountant General Department (AGD), and Internal Audit Directorate (IAD) to ensure the timely production and public dissemination of annual audits reports of consolidated government financial statements.

**Component 2: Supporting Public Administration Modernization:** The objective of this component is to lay the foundation for improved efficiency, transparency, and oversight of public employment management. This objective will be achieved by addressing human resource( HR) policies and practices; improving the reliability of the HR data that underpins day-to-day management of the public workforce; and automation of HR processes and data through the introduction of a Human Resource Management Information System (HRMIS), which will be managed by the Ministry of Public Service, Administrative Reform, Policy Coordination and Delivery (MPA).

**Component 3: Strengthening Transparency and Citizen Engagement in Service Delivery:** The objective of this component is to support transparency and citizen engagement in The Gambia, which is critical to improving service delivery. This objective will be attained by improving the availability and usability of administrative and statistical data to support evidence-based policymaking and improved monitoring of services. It will be further supported by the deployment of key tools for enhanced citizen oversight and engagement.

**Component 4: Project Management:** The overall objective of this component is to: (i) ensure the project manages resources effectively and responds to risks; (ii) promote a robust approach to monitoring the efficiency and effectiveness of implementation; and (iii) provide resources in the event of an emergency or natural disaster.

### 1.2 Project Beneficiaries

The primary beneficiaries of the project are public institutions responsible for fiscal and human resource management, as well as service delivery institutions in selected sectors. In this regard, TA and capacity-building support will benefit The Gambia Revenue Authority ( GRA), Tax Policy Directorate (TPD), IAG, National Audit Office (NAO), and Accountant General’s Department (AGD) (under component 1); the Ministry of Public Administration (MPA) (under component 2); and the MPA, Gambia Bureau Of Statistics (GBoS), and Ministry of Basic and Secondary Education MoBSE (under component 3). At a secondary level,

it is expected that a more transparent, accountable, and capacitated public administration will benefit the general public through greater efficiency in the use of public resources as well as improved capacity to design and deliver public services, especially in the human development sectors which is a direct focus area of the project. Engagement mechanisms that support transparency and accountability will similarly support citizens and Civil Society Organizations, media, and citizens to have better access to service delivery performance information and greater opportunity to express their views on government services through the citizen engagement activities.

### 1.3 Summary of the main project activities

The project activities include technical assistance in support of policy formulation and implementation as in the tax administration (ITAS) in GRA and the management of human resources within the Ministry of Public Service, Administrative Reform, Policy Coordination and Delivery (MPA). There will also be training and capacity building of staff in the use of the new systems and processes, new IT equipment to be acquired to support for the new processes and procedures in the different government agencies benefitting from the project. Other activities include outreach campaigns to raise awareness and promote the use of the new system processes such e-filing and e-payment options under ITAS. In this respect, special campaigns will be carried out to address the specific needs of women to facilitate their use of e-filing to decrease their chances of being exposed to corrupt practices and facing harassment when filing taxes due to lower person-to-person interaction. ~~The Project will carry out similar awareness campaigns for citizens to understand and participate in the citizen engagement~~ For citizen engagement, the activities will include improving the availability and usability of administrative and statistical data to support evidence-based policy making and improved monitoring of services. Other activities will include the rationalization of the Gambia's citizen engagement activities into a harmonized framework, which will support the elaboration of an Open Government Review, which could lead to the eventual development of an Open Government Partnership (OGP) National Action Plan. There will also be the piloting and scaling up of tools to collect real-time user feedback to gauge citizen satisfaction with services, starting with the education sector.

Such tools would include high-frequency digitally enabled survey instruments (e.g., online, SMS, phone surveys, etc.) as well as analog opportunities for collecting citizen feedback at points of service. This activity would also involve developing an awareness campaign for citizens to understand the reasons for the surveys and the importance of providing feedback.

### 1.4 Project Intervention zones

The project intervention zone will be mainly in the Greater Banjul Area where the key institutions affected by the project are located; however, the impact of the proposed policy and operational reforms will be felt countrywide.

### 1.5 Potential Environmental and Social Risks and Impacts

The project is a technical assistance and capacity building project with no civil works, land acquisition or restriction of access to resources and as a result, the risk rating of the project is **Low**. The environmental and social risk and impacts of the project include:

**a) Environmental risks and Impacts**

- **Risk of increased e-waste generation.**

The project is expected to purchase IT equipment (e.g. computers, servers), which will result the creation of e-waste thus raising the issue of e-waste disposal. The e-waste generation is expected to low but will need to be safely disposed of.

- **Risks of Communicable Diseases particularly COVID-19**

The project plans to carry out many training and awareness raising activities all of which will bring together many people thus increasing the risks of infection especially from COVID-19.

**b) Social risks and impacts**

The social risks and impacts include the following:

- **Risk of exclusion of vulnerable and disadvantaged groups and individuals**

This category would include women taxpayers some of whom may not be literate. In introducing ITA, it is important to have adequate consultations with them to identify clearly the challenges they face which may not be limited to their illiteracy status and prepare sensitization/training programs that take account of the time convenient to them to participate in such programs.

- **Risks of discrimination in the selection of female participants in the training and capacity building programs**

The project has many training and capacity building programs, which could be of interest to female government employees and business- women. There is a risk of discriminating against these groups if special measures are not taken to facilitate their participation.

- **Risks of sexual exploitation and abuse/ sexual harassment (SEA/SH) in the work place and in the training and sensitizations programs**

These risks can occur in the project offices and during sensitization/ awareness activities to be conducted in the communities particularly those relating to citizen engagement.

## 2. Brief Summary of Previous Stakeholder Engagement Activities

During the preparatory phase, there were consultations with the different categories of stakeholders, which included Government ministries, departments, development partners and NGOS and private business.

From February 20 to March 2, 2023, there was a World Bank mission to discuss the project concept with the Government. These consultations identified the project further, defined the project components and activities and discussed the required project preparation activities. The format of the meetings was physical meetings between the different government agencies <sup>1</sup> and the World Bank staff. In addition, the World Bank staff had meetings with development partners, which included representatives of the International Monetary Fund (IMF), the United Nations Development Program (UNDP) and the European Union (EU).

As part of the preparation of the Stakeholder Engagement Plan, the Consultant held further consultations with the stakeholders. The main conclusions of these consultations were as follows:

- (i) The stakeholders welcomed the project as it will enhance policy formulation and improve their operational efficiency which will result in improved service delivery;
- (ii) Enhance Institutional capacity through training and supply of modern equipment to improve service delivery;
- (iii) Make payment of tax easier for the tax payer but this has to be supported by awareness raising campaigns;
- (iv) Making information about government activities and engaging the public to discuss them was considered a very important issue
- (v) They welcome the awareness-raising programs for the public because for the citizen engagement to be successful the citizen must first understand the information being delivered and how to use it;
- (vi) Finally, on community reach out programs, should consider carefully the timing for such programs especially in the rural areas.

A summary of these consultations and the list of participants are attached as **Annex 3a and 3b respectively**.

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<sup>1</sup> Min. of Finance of Finance, Min. Public Service, Administrative Reform, Policy Coordination and Delivery, Ministry of Basic and Secondary Education, Gambia Revenue Authority, National Audit Office, Accountant General's Department, Internal Audit Directorate, Gambia Public Procurement Agency, Directorate of State Owned Enterprises, Gambia Bureau of Statistics.

### 3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The purpose of stakeholder identification is to determine groups and individuals likely to be affected directly or indirectly (positively or negatively) or to have an interest in the project. To develop an effective plan, the identification of stakeholders takes account of the interests of the stakeholders in the project, participation needs, level of vulnerability, expectations in terms of participation and priorities of the stakeholders.

Project stakeholders are defined as individuals, groups, or other entities who:

- (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘**affected parties**’); and
- (ii) may have an interest in the Project (‘**interested parties**’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Affected Parties include:

#### 3.1 Affected Parties

Affected parties will include:

- 1) The Ministry of Finance and Economic Affairs
- 2) The Ministry of Public Service
- 3) Ministry of Basic and Secondary Education
- 4) Gambia Revenue Authority
- 5) Auditor General’s Office
- 6) Accountant General’s Office
- 7) Internal Audit Directorate
- 8) Small and medium sized enterprises and tax paying public
- 9) Contractors

The table below presents the Affected stakeholders showing their roles and interest in the project. An analysis of the stakeholder in terms of their interest and power in the project is provided in **Annex 4**.

*Table1: Summary of Affected Stakeholders showing their roles and interest in the project*

Stakeholder	Current Responsibilities/Roles	Interest in the Project
Ministry of Finance and Economic Affairs	Responsible for managing the public finances of the Government and formulation of economic and fiscal policies and the implementing agency for the project	Strengthen the oversight of fiscal resource in terms improved tax administration procedures practices and oversight of tax expenditures and improved internal audit system
Ministry of Public Service	Responsible for the formulation and implementation of policies to manage the public service	Improved reliability of HR data and automation of HR processes through the introduction of HRMIS. Improved transparency and decision-making process.

Ministry of Basic and Secondary Education	Formulation of educational policy and provision of educational services at primary and secondary school levels.	Improve management of the human resources by maintaining up-to-date records on job vacancies, enforce recruitment ceilings, and identify human resource gaps in the sector. Improved planning, budgeting, and policy evaluation processes Improving access of the public to the performance of schools, achievements, and constraints through the score cards as part of citizen engagement
Ministry of Health	Formulation of national health policy and provision of health services to the public	Improve management of the human resources by maintaining up-to-date records on job vacancies, enforce recruitment ceilings, and identify human resource gaps in the sector. Improved planning, budgeting, and policy evaluation processes to improve health service delivery
Gambia Revenue Authority	Collection of taxes including income tax on behalf of the government	Improved tax administration practices through the introduction of ITAS for better identification and management of the tax base. Improved capacity of staff to manage ITAS and less cumbersome process for the tax payer
Internal Audit Directorate	Provide audit services to government ministries, departments and agencies	Detailed reporting framework for the preparation of government annual financial statements in accordance with International Public Sector Accounting Standards (IPSAS). Improved tools and techniques to perform risk based auditing;
Accountant General's Department	Responsible for managing the financial transactions and reporting for the public sector,	Elaboration of a detailed reporting framework to improve the preparation of government annual financial statements in accordance with IPSAS
National Audit Office	Carries out the annual audit of government ministries and departments and oversee the auditing of state owned enterprises (SOE).	Strengthen quality assurance system and capacity to conduct performance audits
Contractors and service providers for supply of IT equipment	Provide policy advice, supply IT equipment(both soft and hardware) and provide training	Opportunities to have contracts

### 3.4 Interested Parties

This category of stakeholders include the following:

- 1) Project Implementation Unit
- 2) Gambia Bureau of Statistics
- 3) National Assembly
- 4) Parent Teacher Associations (PTA),
- 5) Mothers Clubs,
- 6) Village Development Committees (VDCs),
- 7) School Management Committees
- 8) Gambia Bar Association
- 9) TANGO
- 10) Gambia Participates
- 11) Female Lawyers Association-Gambia
- 12) Gambia Institute of Chartered Accountants
- 13) Gambia Women’s Chamber of Commerce
- 14) Public (individual tax payers and consumers of government services)
- 15) NGO active in Health and Education sectors (Action Aid International The Gambia, Catholic Relief Services etc.)

The table below indicates the role and interest of these stakeholders in the project’

*Table2: Summary of Interested Stakeholders showing their roles and interest in the project*

Stakeholder	Current Responsibilities/Roles	Interest in the Project
Ministry of Women, Children and Social Welfare	Responsible for gender policy and women empowerment, poverty reduction and prevention of gender-based violence	Collaborate with the project in implementing activities to address gender inequality and risks of SEA/SH and children’s performance in schools
Project Implementation Unit (PIU),	Management of the project on a day-to –day basis	Ensure project activities are executed as planned and carry out regular monitoring of performance to ensure compliance
National Assembly	Responsible for make laws and receiving and discussing national audit reports	Improved preparation of national audits that would prevent the delays experienced currently. Greater transparency of revenue expenditures for the constituency members
Small and medium sized businesses	Engaged in medium and small business and requiring to pay taxes	An improved tax payment system that will reduce the time spent in filing tax returns
Public including community members	Tax payers and also beneficiaries of the services provided by government agencies	Improved service delivery because of improved policies and processing. Expect greater value for money
Parent Teacher Association	Provide a forum for parents and teachers to discuss about the children and the school with the a view to improving general welfare of the school	Access to information of school performance on the scorecard to understand better the performance of their schools and the types of challenges to address. Empower them to better understand how the school system operates.

Mothers' Clubs in schools	Similar to the PTA the club provides a forum for women (mother of the school children) to interact with the school authority and provide limited in-kind support to the school	Access to information of school performance on the scorecard, help parents especially the women to better understand the performance of their school and the types of challenges to addressed.
School Management Committee	This comprises the principal and the senior teachers of the school and their principal role is to assist the school headmaster to run the school.	Access to improved information from an independent source to guide deliberations of the committee and also provide an advocacy tool for some of their demands on the Ministry
Ward and Village Development Committees	Responsible for planning and mobilizing resources for the ward and village development plans	Easy access to information about their schools' performance as well as the health services. Expect improved service delivery in these sectors
Gambia Radio and Television Services	Provide nationwide coverage of news and entertainment	Collaborate with the project to inform the public about project activities in the form of press releases and special coverage. Provide a platform for citizen engagement to promote a more open government.
Media -Television (Paradise TV, QTV, Eye TV etc.)	Provision of news and entertainment to the public	Inform public about project activities and any special messages released by the project. Provide a platform for citizen engagement to promote a more open government.
Radio ( West Coast Radio, Kora FM)	Provision of news, education and entertainment to the public	Opportunity to collaborate with the project to inform the public and provide a platform for citizen engagement to promote a more open government.
Community radios	Entertainment and news for the public	Convey announcements about the project to the communities within its coverage and provide a platform for communities to discuss service delivery of key ministries, national audit report findings and recommendations as part of the citizen engagement.
NGOs active in the education and health sectors and open government (Action Aid, Catholic Relief Service etc.)	Support in the provision of health and education at the community level as part of improving the human resource capacity of the country	Access to more realistic information about current situation and the challenges to be addressed to better guide their intervention in terms of area and quantum
Gambia Bar Association	Seeks an enlightened and transparent legal environment in the Gambia in which the rule of law is upheld, access to justice is assured and the protection. As a result it is active in advocacy for transparency and rule of law	Expect a more active engagement of the Government and the public and thereby generate an enlightened citizenry. The production of independent audit reports will facilitate the dialogue. Possibility of collaborating with the project for the public sensitization
Female Lawyers Association- Gambia	Aims to contribute to the development and realization of the rights of women and	An improve tax filing system that would save women from long hours at the tax office. Expect to collaborate in sensitizing women business

	children including children’s welfare. The Association works closely with women groups.	owners about the tax laws and the proposed new tax administration system
Gambia Participates	Seeks to promote fiscal transparency by facilitating public discussion of the government budget, conducts open budget surveys and discussion. Works closely with government ministries. Uses social media platforms to disseminate and encourage interaction with a wider audience on the budget and audit reports.	Expects greater openness from the ministries and a willingness to engage the public about their performance. The public would become more empowered. The organization expects to closely collaborate in the CE component of the project
Gambia Women’s Chamber of Commerce	Help organize business women and support them with training and access to other forms of support. Encourage their members to register with GRA and pay their taxes.	An improved tax payment system to help the members who complained of spending too much time at the tax office when they have to take care of their business, their homes and children. Expect that the complaint of the members that they are over-taxed will be addressed by having a more objective assessment process. Expect possibility of supporting the members on the new tax system
Gambia Institute of Chartered Accountants	Strengthen the accountancy profession in the Gambia. The Institute licenses and monitor accountants to ensure maintenance of standards. Many of the SOEs are audited by the members of the organization	Expect greater transparency and access to the various reports and that the Institute can collaborate with the project in the training and capacity building of the accounting cadre in the ministries and the SOEs

**3.5 Disadvantaged and Vulnerable Groups<sup>2</sup>**

Vulnerability may stem from a person’s origin, sex, gender identity, sexual orientation, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), or dependence on other individuals or natural resources, etc. Due to their status, they may not be adequately consulted, which may reduce their access to potential project benefits. This category will therefore require specific measures and/or assistance to address their vulnerability to

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<sup>2</sup> Vulnerable status may stem from, among other things, an individual’s, or group’s race, national, ethnic, or social origin, color, sex, sexual orientation, gender identity, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

certain risks, including SEA/SH. Within the Project, the vulnerable or disadvantaged groups will include, but are not limited to, the following:

- a) Illiterate small business owners especially women
- b) Female employees in government institutions who may be discriminated in the selection for training and capacity building programs
- c) Government employees with disabilities

To ensure adequate engagement with the vulnerable individuals and groups often requires the application of specific measures and assistance aimed at facilitating their participation in project-related decision-making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders. This is particularly important in the public awareness campaigns and the project will adopt a social inclusion approach using communication channels that ensure that vulnerable groups are adequately consulted and engaged in the project. The methods will include arranging special meetings with them at a more convenient place and time and using a language they understand. Women, will be consulted independently in safe and enabling environments and grouped by age ranges with a female facilitator to ensure that sensitive issues of concerned to them are discussed.

### 3.6 Summary of project stakeholder needs

**Table 3** below presents a summary of the needs of different groups of stakeholders in terms of language, channels of communication and any special needs

Table 3: Summary of project stakeholder needs

Stakeholder Group	General Composition	Language Requirement	Preferred means of communication (e-mail, radio, phone and letter, WhatsApp)	Special needs (Access, meeting times etc.)
Government Ministries& Technical Depts.& implementing partners	Comprise government employees, policy and IT specialists in tax, finance and human resources	English	Letters, e-mails meetings/workshops & video conferencing	Need to have advance notice for meetings and should preferably take place during working days preferably not on Mondays and Fridays
National Assembly	Comprise elected officials to pass laws and oversight functions	English	Letters, e-mails meetings/workshops	Need to have advance notice for meetings and should preferably take place during working days
Public	Medium and small businesses, Individual tax payers	English, Local languages (Mandinka, Wolof, Fula, Jola etc.)	Meetings, workshops , radio & television, social media, telephone, radio and TV programs	Need to have advance notice for meetings and preferably during weekends.
Local Communities in urban areas	Members of school PTA, School Senior Management Committees, Mothers Club etc.	Local languages (Mandinka, Wolof, Fula, Jola etc.)	Need to have advance notice for meetings and should preferably take place during working days	Need to have advance notice for meetings and should not take place on weekends.
Local Communities in rural areas	Members of school PTA, School Senior Management Committees, Mothers Club etc.	Local languages (Mandinka, Wolof, Fula, Jola etc.)	Need to have advance notice for meetings and should preferably take place during working days	Need to have advance notice for meetings and should not take place during the rainy season (July to November)
Media	Several outlets including print and electronic, (radio, newsprint and television, social media)	English Local Languages (Mandinka, Wolof & Fula)	Mails, e-mails meetings & video conferencing, interviews	Need to have advance notice for meetings and should preferably take place during working hours
Disadvantaged and Vulnerable groups	Comprise illiterate female business owners, female employees, employees with disabilities, persons suffering from HIV/AIDS	English  Local Languages (Mandinka, Wolof & Fula)	Meetings, communication through radio and television and the creation of WhatsApp groups	Need to have advance notice for meetings and should preferably take place during working hours
NGO/CSO	Local and international NGOs, CSO	English	Mails, e-mails meetings & video conferencing, WhatsApp	Need to have advance notice for meetings

		Local Languages (Mandinka, Wolof & Fula)		
Service providers & suppliers	These include firms to carry out the technical assistance and suppliers of IT equipment etc.	English	Letters, emails meetings, announcements through the media, social media	Give wide publicity about the information through media when tenders are floated.

## 4. STAKEHOLDER ENGAGEMENT PROGRAM

### 4.1 Purpose and Timing of Stakeholder Engagement Program

Stakeholder engagement is an inclusive and iterative process conducted throughout the project life cycle and enables the project to engage beneficiaries and stakeholders regularly to improve the environmental and social sustainability of projects, enhance project acceptance, and make significant contribution to successful project design and implementation.

The goals of the Stakeholder Engagement Plan (SEP) are as follows:

- Establish a systematic, inclusive, and participatory approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties
- Assess the level of stakeholder interest and support for the project and to enable their views to be considered in project design and environmental and social performance.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them, especially those who may be vulnerable or disadvantaged
- 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; and,
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances, including an ethical, confidential and survivor-centered grievance mechanism to address SEA/SH complaints

The table below presents a strategy for stakeholder consultation.

Table 4: Strategy for Stakeholder consultations

Project stage	Topic of consultation/message	Method to use	Timetable	Target Stakeholders	Responsibilities
<b>BEFORE APPRAISAL</b>					
Project preparation	<ul style="list-style-type: none"> <li>• Project design</li> <li>• Project benefits &amp; risks</li> <li>• Institutional arrangements</li> <li>• Identification of implementing partners</li> <li>• Project financing</li> <li>• Other donor interest in the project</li> </ul> Project risks and impacts	<ul style="list-style-type: none"> <li>-Interviews</li> <li>-Formal meetings</li> <li>-Video conference</li> <li>- Letters &amp; memos</li> </ul>	Before appraisal	<ul style="list-style-type: none"> <li>-M/Finance &amp; Economic Affairs</li> <li>- World Bank</li> <li>-MPA, MOBSE</li> <li>GRA, AGD, IAD, NAO</li> </ul>	Project Preparatory Team /PIU GFMDP (PIU)
<b>Preparation of E &amp; S documents (ESCP, SEP &amp; LMP)</b>	<ul style="list-style-type: none"> <li>• Project benefits &amp; risks</li> <li>• Stakeholder consultation requirements</li> <li>• Gender</li> <li>• Vulnerable groups</li> <li>• GM Procedures including SEA/SH reporting procedures</li> </ul>	<ul style="list-style-type: none"> <li>• Key Informant Interviews</li> <li>• Focus group discussions</li> <li>• Meetings with female business owners facilitated by a female facilitator</li> </ul>	<ul style="list-style-type: none"> <li>• Before appraisal</li> </ul>	<ul style="list-style-type: none"> <li>• Government technical departments and Implementing Partners</li> <li>• Local communities</li> <li>• NGOs active in the governance</li> <li>• Vulnerable groups including female employees business women</li> </ul>	PIU and Consultant
<b>IMPLEMENTATION PHASE</b>					
<b>Sensitization of stakeholders including project beneficiaries about the E &amp; S instruments</b>	<ul style="list-style-type: none"> <li>• LMP &amp; SEP requirements</li> <li>• GM procedures including SEA/SH reporting</li> </ul>	<ul style="list-style-type: none"> <li>• Meetings</li> <li>• Workshops</li> <li>• local radios</li> </ul>	At the start of the project and throughout the implementation	<ul style="list-style-type: none"> <li>• Government agencies participating in the project</li> </ul>	PIU

	<ul style="list-style-type: none"> <li>• Messages on SEA/SH Prevention and Response Action Plan</li> </ul>			<ul style="list-style-type: none"> <li>• Local communities where sensitization activities will take place</li> <li>• Vulnerable groups including female office workers, illiterate women business owners</li> </ul>	
<b>Dissemination of government reports ( budgets, audit reports, scorecards)</b>	Budget, National Audit reports Score cards	<ul style="list-style-type: none"> <li>• Meetings</li> <li>• Workshops</li> <li>• Radio, TV and print media</li> <li>• Community/local radios</li> </ul>	At the start of the project and throughout the implementation	Tax payers, local communities National Assembly members NGOs & CSOs in the governance sector	PIU and the sectoral implementing partners

### 4.3 Proposed strategy for consultations

**Consultation during COVID-19:** With respect to the risks related to COVID -19, the Project will respect the World Health Organization’s (WHO) and national guidelines for preventing the spread of COVID-19. It will also take account of the World Bank’s “Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” (March 20, 2020). In line with the above guidelines, different engagement methods are proposed depending on the different needs of the stakeholders as indicated below:

- In-house consultation meetings and interviews with small groups (using masks if required)
- Administration of Mid-Term survey questionnaire
- Focus group meetings with limited number of participants
- One-on-one interviews
- Public notices ( using local and national newspapers, radio, TV, billboards, mosques and churches announcements, local markets, Alkalos, and WDCs)
- Telephonic interview
- Text messages:
- Electronic publications and press releases on the TV, radio
- Ministry of Finance and Economic Affairs website outlet:  
[www.mofea.gov.gm](http://www.mofea.gov.gm)

### 4.4 Proposed strategy to incorporate the view of vulnerable groups

The project will carry out targeted stakeholder engagement with vulnerable groups to understand their concerns and needs in terms of accessing information on the project and other support agencies. These will include arranging special meetings with them at a more convenient places and time (not Fridays, or during time women are at the market with their businesses or during Ramadan) using methods and places to ensure persons with disabilities are included. In the case of sensitive topics such as SEA/SH women should be independently consulted in safe and enabling environments with female facilitators leading the group discussions.

### 4.5 Reporting back to stakeholders

The Ministry Finance and Economic Affairs through the PIU will document all program activities, and the consolidated reports will be made available to the stakeholders and the relevant authorities. To ensure that the information presented in the SEP is consistent and is the most recent, the SEP will be periodically revised and updated, as necessary during project implementation. The review will also assess whether the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to project related activities will be reflected in the SEP. Monthly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible PIU staff and referred to the PIU management of the project. A sample form for collecting feedback information from stakeholders is attached as **Annex 2**. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner.

Information on public engagement activities undertaken by the Project during the year will be conveyed to the stakeholders in two possible ways:

- i) Publication of a standalone annual report on project's interaction with the stakeholders and meetings with stakeholders to discuss the report in meetings and workshops; and
- ii) Publication of the reports on the project website, social media, TV, newspapers, PIU office etc.

## 5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

### 5.1. Resources

The future social specialist to be recruited by the PIU will be in charge of stakeholder engagement activities and will be supported in this role by the GBV consultant.

### 5.2. Management functions and responsibilities for managing the Stakeholder Engagement Plan

Overall responsibility for the project will lie with the Ministry of Finance and Economic Affairs, which will host the Project Implementation Unit that will be responsible for the day-to-day management and coordination of project activities. The social development specialist within the PIU will be directly responsible for coordinating the implementation of the stakeholder engagement activities in collaboration with other members of the PIU.

The Ministry will recruit the following categories staff to support the PIU:

- **The Social Specialist** will be responsible for coordinating the implementation of the GM and support stakeholder consultations
- **The GBV Consultant** will be hired as needed to provide training on GBV /SEA/SH

The stakeholder engagement activities will be documented through:

- Monthly/quarterly reports
- Ministry of Finance website,
- Radio (both national and local), television and social media including Facebook
- Letters and press releases

The Stakeholder Engagement Plan will be incorporated in the Project Implementation Manual and the Annual Work Plan and Budget.

## 6. GRIEVANCE MECHANISM (GM)

The main objective of a grievance mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader stakeholder consultation that facilitates corrective

actions. It helps to resolve disputes at the earliest possible time before they escalate. Project-affected persons should be heard and be able to voice concerns, and as such, they must have access to fair, transparent, and accessible means to address their concerns and views related to the project.

A functioning, inclusive and accessible grievance mechanism is essential for the environmental and social sustainability of the project. The present mechanism is for the entire project. However, the grievance mechanism for project workers is provided separately under the Labor Management Procedures prepared for this project.

## 6.1 Principles of GM

The GM will adopt the following six core principles to enhance its effectiveness:

- a. **Fairness:** Grievances will be treated confidentially, assessed impartially, and handled transparently.
- b. **Objectivity and independence:** The GM will operate independently of all interested parties in order to guarantee fair, objective, and impartial treatment to each case. Officers working under the GM will have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
- c. **Simplicity and accessibility:** Procedures to file grievances and seek action will be made simple enough that project beneficiaries can easily understand them. Project beneficiaries will have a range of contact options/reporting channels including, at a minimum, a telephone number, an email address, and a postal address. The design of the GM will be such that it is accessible to all stakeholders, irrespective of where they live, the language they speak.
- d. **Responsiveness and efficiency:** The GM will be designed to be responsive to the needs of all complainants. Accordingly, all officers handling grievances will be trained to take effective action upon, and respond quickly to grievances and suggestions. Officers in charge of SEA/SH complaints will receive additional training on confidential handling of sensitive information and survivor-centered approach.
- e. **Speed and proportionality:** All grievances, simple or complex, will be addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is expected to be swift, decisive, and constructive.
- f. **Participatory and socially inclusive:** All project-affected persons – community members, members of vulnerable groups, project implementers, civil society, and the media - are encouraged to bring grievances and comments to the attention of project authorities. Special attention is given to ensure that poor and disadvantaged groups, including those with special needs, can access the GM.

## 6.2 Objectives of Grievance mechanism

The grievance mechanism aims to provide an operational, fast, efficient, transparent and inclusive grievance management system that allows for the prevention or resolution of grievances and conflicts through negotiation and dialogue with a view to an amicable settlement. It is essentially based on two principles: mediation and conciliation. However, for SEA/ SH related grievances the reporting, referral and handling of grievances are governed by specific principles and procedures.

This mechanism is not intended to be a mandatory prerequisite, nor to replace the legal channels for managing complaints and conflicts.

### The key objectives of the GM are to:

- Record, categorize and prioritize the grievances according to severity and immediacy of the issue, and provide timely, fair, accountable resolution to grievances at the project level
- Ensure multiple and accessible channels for all stakeholders, especially those who are vulnerable or disadvantaged
- Settle the grievances via consultation with all stakeholders (and inform stakeholders of the solutions, obtain their views on the outcome, and ensure they understand possible next steps to escalate if they are not satisfied with the outcome)
- Prevent the risks and mitigate the impacts of SEA/SH by facilitating access to GBV service, raising awareness on SEA/SH amongst workers and community and enforce sanctions against perpetrators in line with the code of conduct of the project
- Forward any unresolved cases to the relevant authority
- Regularly analyze grievances to assess if there are systemic issues in the project that should be addressed to mitigate the same types of issues being reported

The GM operates within the existing legal and cultural context of The Gambia. It will also take into consideration World Bank procedures and recommendations regarding complaint handling and monitoring and reporting on their resolution.

The specific nature of sexual exploitation and abuse and sexual harassment requires appropriate measures for reporting and handling these allegations safely and ethically through the complaint management mechanism.

### 6.3 Structure of the GM

The PIU will establish a GM system for receiving and managing complaints at two levels:

**Level 1: Grievance Redress Committee:** within the PIU a grievance redress committee (GRC) will be set and it will be responsible for receiving and resolving complaints in a fair, objective, accountable, effectively, timely and accountable manner in all phases of the project lifecycle.

The responsibilities of the Committee will comprise:

- Receiving, reviewing, investigating, and keeping track of grievances
- Adjudicating grievances
- Monitoring and evaluating the fulfillment of agreements achieved through the grievance mechanism.

The membership of the GRC will include:

- (i) The Project Manager, PIU or his representative;
- (ii) an NGO working in the sector;
- (iii) A representative of the sector affected by the complaint;
- (iv) A representative from the Ministry of Gender, Children and Social Welfare;
- (v) Social development specialist in the PIU serving as the secretary to the Committee.

The Project Manager will chair the Committee and the MoFEA will determine a sitting allowance for GRC members.

**Level 2: The Project Steering Committee(PSC):** if grievances cannot be resolved at Level 1 the Project Manager will refer the complaint to the PSC composed of high-level officers representing all project stakeholders and will be chaired by the Permanent Secretary, MoFEA or his representative.

In cases where a complaint cannot be resolved at the level of the PSC, the complainant can proceed to the judicial/legal system as provided for in the Constitution of the Republic of The Gambia, 1997 and other relevant laws. The complainant will bear the legal costs.

#### 6.4 Grievance Mechanism Procedure for complaints unrelated to SEA/SH

The PIU will provide stakeholders with multiple grievance uptake locations and multiple channels for receiving grievances. These uptake channels can include:

- Toll-free telephone dedicated to the grievance mechanism. Access to this number will be free for complainants;
- E-mail;
- Letter to project focal points in the sectors ;
- Complaint form to be lodged via any of the above channels
- Walk-ins may register a complaint on a grievance logbook at various easily accessible facilities.

In addition, for each level of grievance management, the PIU will establish a grievance register (see annex), which will be opened as soon as project activities begin and this together with the uptake points and the channels and conditions of access will be widely disseminated to the public during the stakeholder consultations. A focal point will be identified (social development specialist) to receive and register complaints. Complaints related to SEA/SH will be registered separately.

Below is the procedure for submitting and resolving complaints.

##### **Step 1: Receipt and registration of complaints**

The channels for receiving complaints will be diversified as indicated above. Oral complaints must be transcribed in writing before the start of the rest of the process to ensure traceability (by the secretariat). Any complaint, whether verbal or written, is immediately recorded in a grievance logbook attached as **Annex 5**. The complainant shall receive an acknowledgment of receipt within 48 hours of filing his/her complaint.

##### **Step 2: Triage of grievances and complaints**

A sorting out is carried out by the Committee to distinguish between sensitive (i.e., SEA/SH) and non-sensitive complaints. Non-sensitive complaints will be dealt with by the GRC. Sensitive complaints, after registration by the GM Focal Point (for SEA/SH/sensitive complaints), are immediately transmitted to the special committee set up to address SEA/SH. The time required to analyze a non-sensitive complaint shall not exceed seven (5) days after receipt of the complaint.

### **Step 3: Investigation to verify the merits of the complaint**

At this stage, the information and evidence will be gathered to determine the validity or otherwise of the grievance and to provide solutions to the grievance raised. Specific expertise may be requested by the GRC if such expertise is not available from within the GRC. The maximum period for this phase is ten (10) working days. If further investigation is required, the complainant should be informed accordingly specifying the deadline when a reply will be provided.

### **Step 4: Response proposals**

Based on the findings of the investigations, a written reply will be sent to the complainant highlighting the validity or otherwise of the claim. If valid, the complainant will be informed in writing and/or in the preferred format or method indicated by the complainant (email, letter, SMS, phone) the conclusions of the investigations, the solutions adopted, the means of implementing corrective measures, the schedule implementation and budget. If the complaint was made anonymously, the project will post the resolution on the project website under a specific section reserved for grievance resolution notices, and on Facebook. During stakeholder meetings about the grievance process, stakeholders will be told where to find information related to anonymous complaints and will be encouraged to visit the project website and follow the project's Facebook page for regular updates. The proposed response is made within five (5) working days after the investigations. Similarly, if the complaint is found to be unjustified, a written notification will be sent in the same format to the complainant.

### **Step 5: Review of responses in case of non-resolution at Level 1**

In the event of dissatisfaction, the complainant can take the complaint to Level 2 for a review of the decision of the Grievance Resolution Committee. The period allowed for this is a maximum of fifteen (15) working days from the date of receipt of the notification of the decision to contest the decision by the complainant. In such circumstances, the PSC has ten (10) working days to review the decision of the GRC and propose additional or new measures, if necessary, which the complainant should be notified in writing.

### **Step 6: Implement corrective measures**

The implementation of the measures adopted by the grievance resolution committee cannot take place without the prior agreement of both parties, especially the complainant, to avoid all forms of dissatisfaction and abuse. The procedure for implementing the corrective action(s) start five (05) working days after the complainant acknowledges receipt of the letter notifying him of the solutions adopted and his agreement to the decision to the measures proposed.

### **Step 7: Judicial settlement**

Direct recourse to the courts is possible for a complainant, with or without recourse to amicable settlement and arbitration. However, all measures must be taken to promote the amicable settlement of complaints (except for complaints relating to SEA/SH) through the mechanism set up for this purpose. If the complainant is not satisfied, he or she can take the matter to court. However, this is a last resort and is not recommended for the project as it can lead to high costs and delays.

### Step 8: Completion or termination of the complaint

The procedure will be closed by the GRC if the mediation is satisfactory for the parties, in which case the complainant is required to confirm satisfaction of the resolution in writing. The file is closed after five (05) working days from the date of implementation of the corrective decision, which will then be documented.

### Step 9: Reporting

All complaints received will be recorded in the grievance logbook (Annex 5) for non-SEA/SH complaints and once resolved the resolution should be recorded within ten (10) working days whether the complainant accepts the resolution or not. This operation will make it possible to document the entire complaint management process and to draw the necessary lessons through a simple and adapted database designed for this purpose. The database will also flag the most frequently submitted issues and the places from where the most complaints originate or recurring topics and propose corrective measures to the project if they frequently occur. This will also be reported to stakeholders during stakeholder meetings to demonstrate that corrective actions were taken to address systemic or recurring problems. During the mid-term survey/consultations, the project will also ask stakeholder about the effectiveness, accessibility, reliability and responsiveness of the GM and seek feedback on recommended changes if any. Such changes will be communicated to stakeholders using the various methods (i.e., social media, community consultations, website, etc.).

### Step 10: Archiving

The project will establish a physical and electronic filing system for filing complaints. Archiving will take place within five (05) working days of the end of the reporting. All the supporting documents for the meetings that will have been necessary to reach the resolution will be recorded in the complaint file. The archiving system will provide access to information on: i) complaints received; ii) solutions found; and iii) unresolved complaints requiring further action. The Grievance Logbook is provided and will be transferred to an excel spreadsheet and will also be retained in physical hardcopy( **Annex 5**).

### Complaint processing times

For the system to be operational, it is imperative that the time limits for processing complaints are short and respected. The table below gives the indicative maximum times for processing complaints from the time they are filed to the time they are closed.

*Table 5: Maximum time for processing complaints*

Steps and action	Maximun number of Processing days	Remarks
Complaint filed	0	
Registration	0	
Acknowledging complaint	2	After date of filing
Triage of complaints	5	After date of filing
Investigations	10	After triage
Response	5	After investigation

Review of decision of Level 1	15	After complainant escalates the complaint
Implementation of corrective measures	5	After the complainant agrees to the measures proposed.
Completion /termination of complaint	5	From the date of implementation of the corrective decision
Reporting ( recording of resolution	10	After resolution whether the complainant accepts the resolution or not
Archiving	5	After the end of the reporting

#### 6.4 Implementation and monitoring of agreed measures

This will include ensuring that the solution and/or corrective actions are implemented and monitored. The PIU will assume all financial costs associated with the required actions. The social development specialist will be responsible for ensuring the successful implementation and monitoring of the proposed solution(s) and will report on the progress of the complaint management mechanism. He/she will ensure that the measures agreed upon are implemented within the above-mentioned timeframe.

##### **Complaint tracking**

In addition to the complaints database, a physical and electronic archiving system for complaints will be established as mentioned above. Monthly statistics on complaints will be produced by the PIU's social development specialist, taking into account the following indicators:

- the number of complaints received by type/category of reception channel during the month;
- the number of eligible complaints during the month
- the number and percentage of resolved complaints;
- the number and percentage of complaints resolved within the timeframe;
- the number and percentage of complaints that were the subject of redress;
- the number of complaints that were referred to the courts;
- the rate of GBV/SEA/HS complaints received and not resolved

In addition to this overall GM for the project, a worker's grievance mechanism exists in the Labor Management Procedures. However, workers will also be informed of the project level GM, which they can also access if needed.

#### 6.5 Sensitive Complaints (involving SEA/SH and VAC)

For complaints regarding SEA/SH and VAC, the procedure of receiving and treating the complaint will be different from the procedure for general complaints outlined above. At all times, the approach for such issues will follow a survivor-centered approach, will ensure confidentiality and take action only with survivor's informed consent. The PIU will establish a special committee to manage cases of SEA/SH. The membership of the committee will comprise:

- a. *The social development specialist (who will be trained the GBV Specialist if necessary)in PIU*
- b. *A GBV Specialist*
- c. *A representative from a local service provider with experience in GBV (the 'Service Provider').*

*d. Representative of MoGCSW*

The Committee will receive SEA/HS complaints, conduct investigations in order to establish the link with the project and make referrals to SEA/HS service providers, in accordance with the principles and procedures described in the SEA/HS Prevention and Management Response Plan.

## **7. MONITORING AND REPORTING**

### **7.1 Monitoring of the implementation of the SEP**

The social development Specialist in collaboration with the M&E specialists will be responsible for monitoring the implementation of the SEP.

Several Key Performance Indicators (KPIs) will be monitored by the project on a regular basis, including the following:

- Number of consultation meetings and other public discussions carried out in line with what is outlined in this SEP
- Number of sensitization and training on GM handling activities
- Number of consultations with women (in small groups facilitated by a woman) about the safety and accessibility of GM and effectiveness of SEA/SH mitigation measures
- Number of press releases published which are often broadcasted in local and national levels and social media channels
- Number of grievances from staff and communities
- Number of grievances received from disadvantaged persons or vulnerable groups
- Number of grievances resolved within the prescribed timeline

The implementation of the SEP will be reported in the E&S quarterly report, except for sensitive cases or incidents such as SEA/SH, which should be reported immediately. The monitoring reports will highlight mobilization actions undertaken, the problems encountered, and the solutions provided to resolve them. These reports will be shared with other stakeholders, including the World Bank and will be included in the project activity report to be prepared every six months.

### **7.2 Involvement of stakeholders in monitoring activities**

The social development specialist will conduct monthly visits to the institutions concerned to check whether the GM is in fact accessible, safe, and adequate to address the needs and risks of these stakeholders. In the case of SEA/HS these consultations should not seek out or discuss personal experiences of violence or abuse of individual survivors but ask for overall feedback from women

## **8. BUDGET**

To ensure full implementation of the activities envisaged in this plan, the budget below has been prepared with indicative cost of the activities which comes to about USD 65,000.00 (Sixty –Five Thousand USD) equal to D3,900,000 (Three Million Nine Hundred Thousand Dalasi).

*Table 6: Budget for the implementation of the SEP*

Activity	Responsibility	Date of commencement	Cost in Dalasi	Cost in USD
Information Dissemination of the SEP	PIU	After approval of World Bank	120,000	2,000
Establishment of a platform (interactive website, Facebook pages, WhatsApp)			1,200,000	20,000
Radio & TV programs			1,200,000	20,000
Management of complaints not related to SEA/SH and VAC - Sensitization and training of management committees and office supplies	PIU	At the start of project activities	300,000	5,000
SEA/SH Prevention and Response Action Plan - Training and awareness; Case management and support for psycho-social victims	PIU with support from GBV Consultant		480,000	8,000
M & E	PIU	Regularly based on the overall project reporting plan	Included in project budget	-
External evaluation of the SEP	Consultant	Mid-term and final	600,000	10,000
<b>Total</b>			<b>3,900,000</b>	<b>65,000</b>

Exchange rate: 1USD= GMD 60.00

**9. CONCLUSION**

This Stakeholder Engagement Plan was prepared through a consultative process during which stakeholders were informed about the project objectives, its potential environmental and social risks and impacts as well as the benefits. The consultations also gave an opportunity to the stakeholders to express their views and concerns about the project, which were captured in the section on the stakeholder consultations. The Plan sets out the principles, the process of consultation and participation of stakeholders throughout the project cycle. The plan seeks to inform all stakeholders at all stages of project implementation through meetings, information sharing and through media etc., interviews with the various actors and organizations concerned, public meetings, workshops and discussion groups on issues.

The plan is an operational and flexible document that will evolve as the Project preparation and implementation progresses taking account of the engagement and participation needs of stakeholders.

**Annex1: Sample Form for recording consultations with stakeholders**

<b>Date of Consultations</b>		
<b>Venue of the meeting</b>		
<b>Topic of consultations</b>		
	Name and Function	Organization/Community

<b>Stakeholders Present</b>	1.	
	2.	
	3.	
	4.	
	5.	
	6.	
	7.	
	8.	
	9.	
	10.	
<b>Discussion points</b>	<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> </ul>	
<b>Recommendations</b>		

**Annex 2: Sample of a Feedback form**

<b>Address of the CPCU</b>	<b>Date of Consultation</b>	<b>Venue of Consultation</b>
Name and Status of Stakeholder	Address:	Email:
	Telephone:	
Issues Raised	Summary of the results of the consultations	
Have we left out any point or issue of concern or discussion that was raised earlier?		
Have we left out any important information?		
Is there another important stakeholder that should be consulted?		
What interests you most in the project?		
What information would you like the project to share with you? Through which channels? Do you have limitations in accessing information such as lack of access to mobile phones (including access to SMS, calling), lack of access to the internet and computers, require assistance to read/write,		

mobility issues (i.e. lack of access to transportation), disabilities, other? Do you use social media such as Facebook, other?

What are your suggestions and recommendations to improve this project? What concerns you about this project?

**Photo gallery of the potential stakeholders consulted during the preparation of the SEP**



A business woman at Bakau crafts market



CEO Gambia Women Chamber of Commerce



Discussions with members of GICA



At the offices of Gambia Participates with CEO on the right

Annex 3a: Summary of stakeholder consultations during project identification and preparation

Date	Nature of meeting	Participants	Topics discussed
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February 20 to March 2, 2023	Physical meetings	Representatives of government institutions and staff of the World Bank <sup>3</sup>	Identification of the project, definition of project components and activities and the required project preparation activities
February 24, 2023	Physical meeting	Development partners UNDP, IMF and EU and the World Bank Staff	Briefing about the project and explore areas of donor intervention with possible complementarity
April 4, 2023	Virtual	TTL for the Project, Project Director, M & E specialist in the PIU, W/Bank social development specialist	Establish timeline for the preparation of the SEP and ESCP and support required from the PIU in terms of documentation, contacts for meeting stakeholders and identification of a focal point within the PIU to work with the Consultant
April 6, 2023	Kick-off meeting Kairaba Conference Center	Project Director Staff and Consultant	Reconfirm the timeline for document preparation for SEP & ESCP. Identification of key stakeholders and arrangements for meeting them. Appointment of focal point within PIU to work with the Consultant
April 11, 2023	Meeting with GRA	Deputy Commissioner, Deputy Director, Compliance and Tax Education staff and the Consultant	Welcome the new project because it will reduce the work load and increase efficiency. Some positions may be affected but the staff concerned can be trained and redeployed to other sections. Expressed the need for increased sensitization and training because ITAS is new and may pose a challenge to tax payers especially some businesses owned by illiterate women. In the area of training and sensitization the Authority has a lot of experience as they have been conducting sensitization programs on both radio and TV and in different parts of the country for many years
April 11, 2023	Meeting at the Ministry Public Service	Permanent Secretary 1, Permanent Secretary 2, Director and Consulting team	Welcome the project as the introduction of HRMIS and other policy changes will bring about great improvement in the management of the public service especially in the education and health sector which have the highest number of staff. Making available the score card in education available to the public especially the PTA, SMC etc will encourage greater citizen engagement which can positively improve

<sup>3</sup> Min. of Finance of Finance, Min. Public Service, Administrative Reform, Policy Coordination and Delivery, Ministry of Basic and Secondary Education, Gambia Revenue Authority, National Audit Office, Accountant General's Department, Internal Audit Directorate, Gambia Public Procurement Agency, Directorate of State Owned Enterprises, Gambia Bureau of Statistics, Management Development Institute.

			performance in the schools. Public outreach will be done through the media, town hall meetings, website, social media and regional meetings. Special attention will be paid to women in this regard
April 11, 2023	Meeting at the IAD	Director General, Principal Auditors and Consultant	The staff welcomed the project and the Directorate needs support to improve performance. This is necessary to ensure that government agencies are properly guided and implementation of audit recommendations. Increase capacity would also help the institution to provide the required support to the area councils. Critical areas requiring support include training to build capacity, equipment and vehicles
April 11, 2023	Meeting at National Audit Office	Directors of Audit with the consultant	Welcome the project and expressed the hope that it will be able to support the Office in its capacity building needs especially in the area of performance audit, which is relevant for the SOEs.
April 13, 2023	Meeting at headquarters of FLAG	Executive Director and Consulting team	Highlighted the main area of interest are women and children and activities include the provision of legal aid and awareness raising on key issues affecting them in areas such as education, tax and financial education for women. The Director therefore sees a possible collaboration to sensitize women on tax related issues, education of children including sexual harassments of children in schools
April 13, 2023	Meeting at Headquarters of Gambia Participates	Executive Director and Consulting team	Welcome the project particularly the CE component which is very much in line with the type of work the organization is doing with the Ministry of Finance ie making the budget available to the public in both urban and rural communities and encouraging discussions about revenue and expenditure. Increasing content and making a social audit of the budget as they relate to their wellbeing. Some of the information are translated into local languages
April 13, 2023	Meeting at Headquarters of the Gambia Institute of Chartered Accountants	Chief Executive Officer, Finance and Administrative Manager and the Consulting team	Welcome the project and explained their role as strengthening the accounting profession in the Gambia. The Institute licenses and monitor members to maintain standards. Since some of the auditing of SOEs contracted to private

			<p>firms it is important to strengthen the professional regulatory body.</p>
April 13, 2023	Virtual meeting with TANGO official	Program Officer and the Consultant	<p>Explained TANGO's interest in the project especially the CE. Although TANGO itself does not implement in the field, it has members such as Action Aid International The Gambia, Catholic Relief Service and Child Fund that already working in areas such as child education, health etc.</p>
April 13, 2023	Meeting at Office of Bar Association	President of Bar Association	<p>Welcome the project's focus on CE, which is of interest to the Association. The recently promulgated Information Act will strengthen the CE that will promote easier access to information, accountability and the rule of law.</p>
April 17, 2023	Meeting at MOBSE	Permanent Secretary, System Analyst, Project Manager and Consulting team	<p>Welcome the project but requested for more information so that they better fit in their requirements. Have digital platform, which the Ministry would like to use full capacity. The scorecard is presently manual but would like to see it digitize so it can reach a wider audience greater citizen engagement. At present it is manually presented and only the PTA can participate in the review.</p>
April 17, 2023	Meeting at GWCC	CEO of the Chamber and the consulting team	<p>Welcomed the introduction of ITAS because the members of the Chamber complain about the long period it takes them to file and pay their taxes. Some also complain about the high taxes imposed on their small businesses. There will be a need to sensitize the women about the new system and how the assessment is done so they can understand. In the past the Chamber had organize a sensitization program for them in collaboration with GRA, but that is not enough. The Chamber is disposed to collaborating with the project to carry out similar sensitization for its members.</p>
April 17, 2023	Crafts Market	Business woman	<p>Welcome the project if it will make them save time at the tax office and treat them fairly. According to her, they impose taxes without setting foot in their shop. How do they know my income to determine what I should pay, she asked. She emphasized the need to make the whole process simpler and more equitable.</p>

## ANNEX 4: Stakeholder analysis in terms of influence and interest

GPAMP has different categories of stakeholders who have their own interest and expectations on the outcomes or process of the project and these are not always complementary. Similarly, the relationships between stakeholders are varied and unequal with some having more influence over the fate of the project even though they may have less interest in it, whilst others with little power have great interest to see the project implemented. These complex relationships are important to manage effectively to ensure the project attains its objectives. The sections below highlight these relationships in terms of influence and interest and the key needs of the stakeholder groups.

### a) Stakeholder Influences

In a stakeholder analysis, influence is defined as the extent to which a stakeholder is able to persuade, induce, or coerce others into following certain courses of action with respect to the project. The analysis below is based on several categorizations and assessments. For stakeholders, their level of influence over the project was assessed at three simple levels (high, medium and low).

#### Color Code legend

High		Medium		Low	
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### b) Stakeholder Interest

The level of interest determines how each stakeholder can/is prepared to contribute to the success or prevent the achievement of project objectives, which is classified into three (3) categories: Strong, Moderate and Low.

#### Color code legend:

Strong		Moderate		Low	
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**Table 3: Stakeholder Analysis in terms of influence and interest**

No.	Stakeholders	Level of influence	Level of interest	Proposed actions
1	Project Implementation Unit	High	Strong	This category must be fully engaged with, and make; they have to be involved in all relevant developments
2	Project Steering Committee	High	Moderate	Provide regular information on project activities
3	Ministry of Finance and Economic Affairs	High	Strong	Maintain a high level of dialogue and involvement at all stages of project implementation
4	Ministry of Public Service	Medium	Strong	Strengthen involvement through information and regular consultation and establish a functional feedback mechanism
5	Ministry of Basic and Secondary Education	Medium	Strong	Strengthen involvement through information and regular consultation and establish a functional feedback mechanism
	GRA	Medium	Strong	Maintain a high level of dialogue and involvement at all stages of project implementation

6	NAO, IAD and AGD	Medium	Strong	Strengthen participation through information sharing and regular consultations through a functional feedback mechanism
7	Media	High	Moderate	Develop a new solid and lasting information and communication partnership through greater involvement of the various media in the project activities.
10	NGOs and civil society organizations and the public	Low	High	Make greater use of the knowledge and experience of these organizations at the grassroots interventions

**a) Criteria for evaluating the level of influence of stakeholders**

Level of Influence	Criteria and Recommended actions
High	These actors must be involved at all stages of the implementation of the project due to their high levels of influence. Collaboration with these individuals or organizations is therefore essential to ensure their support throughout the project. The actions of these actors can affect the project or even block it.
Moderate	Individuals or organizations in this category attach great importance to the success of the project and therefore wish to be kept informed of its progress. They do not have the capacity to block the project but can slow down or delay its implementation. These are actors who must adhere to the implementation of the project and with whom it is necessary to ensure close collaboration.
Low	These are the actors who have a very low level of influence in the implementation of the project. The individuals or organizations in this category are not closely linked to the project and do not have a particular influence on the achievement of objectives. The strategy to put in place is to monitor these stakeholders in case their levels of power and / or interest increase.

**b) Criteria for evaluating the level of interest**

Level of influence	Criteria and Recommended Actions
Low	In this category are classified the actors who are interested in the project, wish to collaborate in it but have only a weak capacity to participate effectively in the development and the implementation of the project. Access to information and contribution to decision-making bodies can be called into question at this level: these people are not in fact part of the GRIRAV's decision-making bodies and are not always informed of the activities of the GIRAV Project
Moderate	These actors demonstrate a strong will to cooperate; they are mobilized easily and participate actively in discussions. They have interests directly related to the project.
Strong	These actors are proactive; they take initiatives, communicate on the project, and mobilize people.

**Annex 5: Grievance Logbook for non-sensitive complaints** (separate logbook and intake form for SEA/SH related complaints will be developed before start of project activities)

Case number	Date Claim Received	Name of Person Receiving Complaint	Where/how the complaint was received	Name & contact details of complainant (if known)	Content of the claim (include all grievances, suggestions, inquiries)	Was Receipt of Complaint Acknowledged to the Complainant ? (Y/N – if yes, include date, method of communication and by whom)	Expected Decision Date	Decision Outcome (include names of participants and date of decision)	Was Decision communicated to complainant? Y/N If yes, state when and via what method of communication	Was the complainant satisfied with the decision? Y/N If no, explain why and if known, will pursue appeals procedure	Any follow up action?
01											
02											
03											
04											
05											
06											

