



REPUBLIC OF THE GAMBIA
Ministry of Tourism and Culture

Project Preparation Advance (P177179)

Stakeholder Engagement Plan (SEP)

Tourism Recovery, Diversification, and Resilience in the Gambia Project

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Contents

1. Introduction/Project Description	4
Context and Background	4
1.1 Brief Description of Project	4
1.2 Project beneficiaries.....	4
1.3 Activities: The PPA proposes to focus on the following activities:	5
2. Stakeholder identification and analysis	6
2.1 Methodology.....	6
2.2. Affected parties.....	7
2.4. Disadvantaged / vulnerable individuals or groups.....	9
3. Stakeholder Engagement Program	10
3.1. Summary of stakeholder engagement done during project preparation.....	10
3.2. Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement	10
3.3. Stakeholder Engagement Plan –	11
3.4. Proposed strategy for information disclosure and consultation process	15
3.5 Future of the project.....	16
4. Resources and Responsibilities for implementing stakeholder engagement activities	17
4.1. Resources	17
4.2. Management functions and responsibilities.....	17
5. Grievance Mechanism.....	17
5.1. Description of GM	17
Table 2. Grievance Management Process (for non-sensitive/GBV/SEA/SH related complaints)	18
5.2 Venues to register Grievances - Uptake Channels.....	18
5.3 Grievances Relating to Gender-Based Violence (GBV)	19
6. Monitoring and Reporting.....	19
6.1. Involvement of stakeholders in monitoring activities	19
6.2. Reporting back to stakeholder groups.....	20

1. Introduction/Project Description

Context and Background

This version of the Stakeholder Engagement Plan (SEP) is based on the activities envisaged under the Project Preparatory Advance (PPA). The PPA will be implemented by the Project Implementation Unit of the Ministry of Finance and Economic Affairs (MoFEA) with the collaboration of the Ministry of Tourism and Culture (MoTC). The PIU to be set up by the Ministry of Tourism and Culture will update this SEP thirty (30) days after project effectiveness to cover the activities envisaged for the main project. The SEP will be reviewed and updated on a regular basis, throughout the implementation of the PPA. This SEP will be prepared by the PIU of the MoFEA in consultation with the relevant stakeholders acceptable to the Association. It will describe the timing and methods of engagement with stakeholders throughout the implementation of the project, including the identification of stakeholders, their main characteristics and interests, the different levels of engagement and consultation that would be appropriate for different stakeholders, strategies for information disclosure, measures to remove obstacles to stakeholder participation and how the views of differently affected parties will be captured and addressed, as such the SEP will be amended from time to time with the prior written agreement of the Association.

1.1 Brief Description of Project

The Project objective is the strengthening of sustainable tourism by developing a framework, supporting the enabling environment, building capacity, promoting access to finance for tourism related Micro, Small and Medium Enterprises (MSMEs) and building resilience through risk management and strengthening sustainable coastal infrastructure. The proposed project aims to contribute to economic growth and employment generation by enhancing selected tourism destinations in The Gambia by improving the sector's development framework, increasing the participation and value addition of tourism related MSMEs, and developing sector resilience with the restoration, upgrading, and preservation of critical tourism assets as well as product diversification. The project comprises 4 main components (1) Support to the Tourism Enabling Environment (2); Improving MSME capabilities, skills, and investments within the selected tourism destinations; (3) Support the diversification and resilience of the tourism sector; and (4) Project management.

1.2 Project beneficiaries.

Key project beneficiaries would be:

- a) Technical government agencies such as Gambia Tourism Board to better leverage market intelligence to increase the understanding of demand trends, and promote the destination, diversifying towards new source markets and higher-value growth segments (e.g., birdwatching, ecotourism, etc.).
- b) MSMEs in the sector involved in accommodations, adventure and recreation, attractions, events and conferences, arts and crafts, tourism services, and travel trade that could benefit from partnerships with large firms like hotels, the digital marketplace, tour operators that have proximity to market and are innovators in the sector.
- c) Women and youth who will be assisted to receive tourism skills training since especially women who are typically more present in food services and growth in the tourism sector and given that women-owned businesses are seen to face more constraints. The youth on the other hand tend to be in a permanent cycle of unemployment and vulnerable to dangerous irregular migration due to lack of local job and business opportunities. There are some women/girls and men who are vulnerable in this sector to issues related to sexual tourism and/or sexual exploitation and

abuse/sexual harassment (SEA/SH). Women/youth in this sector would also benefit from measures to reduce these risks in this sector via this project.

- d) Populations living and working along the coastal areas who will be protect against flooding and coastal erosion.

1.3 Activities: The PPA proposes to focus on the following activities:

- **Activity 1:** Project Management for project preparation including preparation of Terms of Reference (ToRs), coordination with agencies and stakeholders for consultations and field visits, development of organizational plan and drafting of the Project Implementation Manual (PIM) (USD 50,000)
- **Activity 2:** Consultant (Technical) to support project preparation including preparation of ToRs, participation in consultations and field visits, and provide inputs into the PIM (USD 50,000)
- **Activity 3:** Consultant (Financial Management) to support project preparation including support to institutional assessment, inputs to PIM on administrative, financial and accounting procedures (USD 50,000)
- **Activity 4:** Consultant (Procurement) to develop the Project Procurement Strategy for Development (PPSD) and provide the relevant inputs into the PIM, and provide continuous support to future PIU (one year of salary) (USD 200,000)
- **Activity 5:** Consultants for environmental and social risk management instruments required under the World Bank's Environmental and Social Framework (ESF) (USD 175,000):
 - i.* Environment and Social Management Framework (ESMF), including a social assessment and sexual exploitation and abuse/sexual harassment (SEA/SH) Response and Prevention Action Plan.
 - ii.* Labor Management Procedures (LMP) (with grievance procedures for workers as well as addressing complaints related to SEA/SH).
 - iii.* Resettlement Policy Framework (RPF).
 - iv.* Stakeholder Engagement Plan (SEP) including a project level grievance mechanism (GM) and ethical, survivor-centered, confidential and efficient grievance procedure and logging/record keeping process for complaints related to SEA/SH.
 - v.* The consultants are also expected to provide support to the Government project team who is required to develop an Environmental and Social Commitment Plan (ESCP)
- **Activity 6:** Consultant (M&E) to support the development of the results framework and provide inputs to the PIM on M&E (USD 50,000)
- **Activity 7:** Project coordination, information, sensitization, consultations, validation of documents, retreat, workshops, identification of sites, field visits during project preparation, including the implementation of this SEP (USD 150,000)
- **Activity 8:** Participation in the regional governance events, workshops and trainings (USD 50,000)
- **Activity 9:** Procurement of equipment and relevant materials such as cars, office furniture, hardware (computers, servers) and software licenses (USD 150,000)
- **Activity 10-** Technical consultancy for the mapping of the MSME ecosystem (USD 150,000)
- **Activity 11:** Technical consultancy for the demand and destination assessment (USD 250,000)
- **Activity 12:** Technical consultancy for the coastal studies and modeling (USD 250,000)

2. Stakeholder identification and analysis

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 Preparation activities (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence Project outcomes.

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e., the individuals who have been entrusted by their fellow group members with advocating the groups’ interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e., the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

2.1 Methodology

To meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are encouraged to 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. Special attention is to be given to vulnerable groups – in particular, women, persons with disabilities, youth, informal workers, landless, illiterate persons, the elderly, and those with chronic illnesses

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

- **Affected Parties** – persons, groups and other entities 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

- **Other Interested Parties** – 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 and/or who could affect the project and the process of its implementation in some way
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹ and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project

2.2. Affected parties

The PPA will not finance civil works. Affected parties include individuals, groups, and communities directly affected by project interventions and other parties that may be subject to direct impacts from the Project. For the PPA phase, the interested parties will essentially be workers from government agencies or institutions who may be involved in PPA activities, directly involved and affected in the process.

The affected parties in this context are mostly people who will need to be consulted for preparatory studies financed by the PPA for works to be undertaken under the Project. These people are likely to be impacted either positively or negatively by the PPA activities. The activities of concern include the preparation of the Environmental and Social Management Framework (ESMF) with the SEA/SH Prevention and Mitigation Plan, preparation of Resettlement Policy Framework (RPF), preparation of the Resettlement Action Plan (RAP), the Labor Management Procedures (LMP), the updated Stakeholder Engagement Plan (SEP), and all other E&S documents requiring public consultation. Activities including baseline survey, and various studies will require meaningful consultation and public input. The exact activities and locations of some of PPA activities have not been finalized, however, they currently include, the institutional assessment (financial management), Project Procurement Strategy for Development (PPSD), Technical consultancy for mapping MSME ecosystem, technical consultancy for the demand and destination assessment, technical consultancy for the coastal studies and modeling.

Specifically, the following individuals and groups fall within this category:

- Permanent Secretary, Ministry of Tourism and Culture (MoTC)
- Deputy Permanent Secretary, MoTC
- Project Director, Ministry of Finance and Economic Affairs
- Chief Executive Officer, Women's Chamber of Commerce
- President, Gambia Youth Chamber of Commerce
- Central Bank of The Gambia
- National Roads Authority
- Ministry of Trade, Industry, Regional Integration and Employment
- Gambia Tourism Board (GTB) Authority

¹ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, illness, physical or mental disability, sexual orientation and gender identity, educational/literacy attainment, employment status, citizenship status, poverty or economic disadvantage, or dependence on unique natural resources.

- National Center for Arts and Culture(NCAC) (including consultations regarding Kunteh Kinteh World Heritage Site as NCAC manages the site with the participation of local communities and local NGO:
- The local communities of Juffureh and Albreda and the CBO-JAYS (Juffureh Albreda Youth Society)
 - Gambia Chamber of Commerce and Industry
 - Ministry of Transport, Works, and Infrastructure
 - Ministry of Environment, Climate Change and Natural Resources
 - National Environment Agency
 - Skills training institutes
 -
 - Ministry of Women, Children, and Social Welfare ~~Gender, Children and Social Welfare~~
 - Residents of communities that might be affected directly or indirectly by the civil works, including Banjul, Bakau, Kololi, Kerr Serign, Bijilo Juffureh, Albreda and Kuntah Kinteh Island
 - Parties that might be affected directly or indirectly due to their direct involvement in the tourism section, including fishers/fish sellers/marketers, including: xxx
 - West African Africa Birds Study Association
 - Stay Green Foundation
 - Gunjur Environmental Protection and Development
 - Wildlife Conservation Trust
 - Sahel Wetland Concern
 - The Association of Fishing Companies
 - TRY Oyster Women’s Association
 - National Association of Artisanal Fisheries Operators (NAAFO)
 - Gambian Women Association of Fish and Vegetable Exporters
 - Association of Fish Processors and Exporters
 - Fish Smokers Association
 - Fish Driers Association

2.3. Other interested parties

This include a broad group of stakeholders who may be interested in the project because of its location, its proximity to natural or other resources, including cultural heritage, or because of the sector or parties involved in the project. For the PPA, this will include relevant ministries and agencies, including the Ministry of Tourism and Culture, Ministry of Finance and Economic Affairs, the National Environment Agency, and Local Districts Authorities in areas where civil works are planned. Other parties that may have interest in the PPA activities will include, but not limited to, local and international development and other partners, such as UNESCO World Heritage Committee; and construction companies/contractors.

The projects’ stakeholders also include parties other than the directly affected people, including:

- Association of Small-Scale Enterprises in Responsible Tourism (ASSERT)
- Beach Bar Association
- Gambia Investment and Export Promotion Agency (GIEPA)
- Tourist Taxi Drivers Association

- Gambia Hotel Association
- Juice Pressers Association
- Ground Tour Operators Association
- Restaurants and Night Club Association
- Horse Riders Association
- Craft Market Association
- Travel and Tourism Association of The Gambia
- Tourism Taxi Drivers Association
- Media (local and national) and traditional media such as TV, newspapers, radios
- Politicians (local, regional)
- Women's Chambers of Commerce
- Informal workers in the tourism industry (women's small business owners, elderly persons)
- Those working in the fishing industry (including artisanal/local fishers)
- Ecotourism Society – The Gambia
- The Gambia Federation of the Disabled (GFD)
- Foundation for Research on Women's Health, Productivity and the Environment (BAFROW)
- ~~Gambia Tourism Authority for the Protection of Children~~
- The National Agency Against Trafficking in Persons (NAATIP)
- Tourism Security Unit (TSU) ~~Local police in tourist areas~~
- Network Against Gender Based Violence (NGBV)

2.4. Disadvantaged / vulnerable individuals or groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be adapted to take into account the needs of such groups or individuals, their concerns and cultural sensitivities, and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic status and financial situation, sexual orientation and gender identity, employment status, citizenship status, disadvantaged status in the community (e.g., ethnic or linguistic minorities), access to information technology, or dependence on other individuals and/or the state. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in project-related decision-making so that their awareness of and input to the overall process are commensurate to those of other stakeholders.

Within the PPA phase, the vulnerable or disadvantaged groups may include and are not limited to the following:

- Workers from government agencies or institutions who may be involved in PPA activities and who do not have sufficient working conditions to respond to the demands of the project

Vulnerable groups affected by the project will be further confirmed and consulted. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

Key stakeholders who will be informed and consulted on the PPA, including individuals, groups or communities for the relevant activities mentioned above, are presented in Table 1.

3. Stakeholder Engagement Program

3.1. Summary of stakeholder engagement done during project preparation

As part of the project identification process, stakeholder consultations were carried out through video conference and meetings.

During November 9-19, 2020, the World Bank team carried out an Identification Mission for the proposed Tourism Recovery, Diversification, and Resilience Project (P177179), in The Gambia as a follow up on the Financing Request received from the Ministry of Finance and Economic Affairs, in October, to support the Tourism Recovery Efforts in The Gambia. At the end of the visit an Aide Memoire was prepared the final version of which was endorsed by the Bank management. The Aide Memoire further refined further the Project objectives and components and reconfirmed the implementation arrangements; the Government also decided to apply for a project preparation advance (PPA) to fund the preparatory activities. The MOTC and MOFEA agreed that the PPA would be implemented by MOFEA through the existing Project Implementation Unit (PIU) that has experience implementing World Bank-financed projects. MoTC will be the Lead Agency for the project and they would coordinate with the relevant stakeholders, including MoFEA, the Central Bank of The Gambia, Ministry of Trade and Investment, Ministry of Transport and Works, National Roads Authority, Ministry of Environment, Climate Change and Natural Resources, National Environment Agency. Memorandums of Understanding (MoUs) will be developed, as needed to support the coordination, roles, and responsibilities of the agencies and would be described in the Project Implementation Manual. The parties also agreed to establish a project preparation core team, led by a Deputy Permanent Secretary as a focal point. This team will work with the World Bank team and MoFEA to prepare the project.

It is anticipated that this document will be updated within thirty (30) days of the Effectiveness Date of the project, by which time key project documents will be disclosed and consultations will be conducted using the most effective methods identified for the circumstances associated with the COVID-19 pandemic (i.e., avoiding personal contact, using personal protective equipment when in contact with others, and maximizing the use of various means of virtual engagement via social media, online surveys, text messages/SMS, telephone hotlines, video conferencing, etc.).

3.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

It is critical to communicate to the public relevant information about the project, what is being done and actions to be taken regularly. Preparedness and response activities should be conducted in a participatory manner and be continually optimized in accordance with community feedback to detect and respond to concerns, rumors, and inaccurate information. Changes in preparedness and response interventions should be announced and explained ahead of time and be developed based on community perspectives. Responsive, empathic, transparent, and consistent messaging in local languages through trusted channels of communication, using community-based networks and key influencers and building capacity of local entities, is essential to establish authority and trust.

The table included in the following section outlines the methods to be employed in stakeholder engagement activities, including consultation and information dissemination. The methods vary according to the characteristics and needs of the interested parties and will be adapted according to the circumstances related to the phases and moments of the project.

3.3. Stakeholder Engagement Plan

Table 1: Stakeholder Engagement Plan for the PPA activities

Activities	Target stakeholders	List of information to be disclosed	Methods of communication and timing proposed
Project preparation	<p>Relevant parties: Ministry of Tourism, Ministry of Finance and Economic Affairs (MoFEA), Central Bank of The Gambia, Gambia national Tourism Board,(GTBoard), National Environment Agency, Ministry of Transport, Works and Infrastructure, Ministry of Trade, Industry, Regional Integration and Employment and Investment, Foundation for Research on Women’s Health, Productivity and the Environment, The Gambia Federation of the Disabled (GFD), Gambia Tourism Board (GTBoard) , Child Protection Agency (CPA)for the Protection of Children, Beach Bar Association, Association of Small Scale Enterprises in Responsible Tourism, National Centre for Arts and Culture (NCAC), Ministry of Trade, Industry, Regional Integration and Employment (MOTIE) and Department of Department, Labor, Ministry of Women, Children and Social Welfare</p> <p>Interested parties: NGO’s, CBO’s</p> <p>Local Communities</p> <p>Vulnerable groups</p>	<p><i>Project description</i></p> <p><i>ESCP</i></p> <p><i>SEP</i></p> <p><i>LMP</i></p>	<p><i>E-mail correspondence and videoconference meetings</i></p> <p><i>Media</i></p> <p><i>Field visits for consultation with communities and experts in identification of sites</i></p> <p><i>Meeting with local communities</i></p> <p><i>Special meetings with vulnerable groups (eg. those who might be vulnerable to sex tourism, informal workers, unemployed youth in the project area, associations/groups who support GBV survivors, sex trafficking, etc.)</i></p>
Preparation of the operating manuals- PIM, administrative, financial and accounting procedure	<p>Relevant parties: Ministry of Tourism, Ministry of Finance and Economic Affairs (MoFEA), Central Bank of The Gambia, Gambia Tourism Board (GTBoard) National Environment</p>	<p><i>Project description</i></p> <p><i>ESCP</i></p>	<p><i>E-mail correspondence and videoconference meetings</i></p> <p><i>Media</i></p>

	Agency, Ministry of Works and Infrastructure, Ministry of Trade and Investment	SEP	Consultation with entities and experts from Regional Institutions Interviews with national and international Experts
Preparation of E&S Instruments	Ministry of Tourism and Culture Ministry of Finance and Economic Affairs (MoFEA) Central Bank of The Gambia, Gambia Tourism Board (GTBoard) National Environment Agency, Ministry of Works and Infrastructure, Ministry of Trade, Industry, Regional Integration and Employment t, Gender Department, Ministry of Women, Children, and Social Welfare , Foundation for Research on Women’s Health, Productivity and the Environment, The Gambia Federation of the Disabled (GFD), Gambia Tourism Board Child Alliance (CPA) Beach Bar Association, Association of Small Scale Enterprises in Responsible Tourism, National Centre for Arts and Culture (NCAC), local police, informal workers in the project area (local arts and crafts, food/drink providers, etc.), small to medium enterprises including women’s SME business groups, the Gambia Federation of the Disabled, Network Against Gender Based Violence (NGBV) Local Communities Vulnerable groups NGOs	Project description ESCP SEP including GM (and SEA/SH GM)	Videoconference, meetings Interviews, local meetings, Consultation meetings and focused group discussions with potential beneficiary communities Special meetings with vulnerable individuals and groups
Information sensitization, consultations, validation of documents, retreat, workshops, identification of sites,	Ministry of Tourism, Ministry of Finance and Economic Affairs (MoFEA) Central Bank of The Gambia, Gambia Tourism Board National Environment Agency, Ministry of Transport, Works and Infrastructure, Ministry of Trade, Industry, Regional Integration and Employment Department of Labor, Beneficiary communities Professional Associations in the Tourism sector	Draft project document Draft environmental and social risk management instruments (ESMF, RPF, LMP, SEP)	Videoconference Meetings, Workshops, Radio, television, newspaper and social media announcements Leaflets Community consultation meetings

	Vulnerable groups and individuals working in the sector (both informal and formal workers)		
Participation in the regional governance events, workshops and trainings	Ministry of Tourism and Culture, PIU-Ministry of Finance and Economic Affairs (MoFEA), Gambia Tourism Board (GTBoard) , Ministry of Trade, Industry, Regional Integration and Employment Representatives of professional associations	<i>To be provided by the organizers</i>	<i>Meeting& workshops</i>
Mapping of the MSME ecosystem	Relevant parties: Ministry of Tourism, Ministry of Finance and Economic Affairs (MoFEA), Central Bank of The Gambia, Gambia Tourism Board (GTBoard) Environment Agency, Ministry of Transport, Works and Infrastructure, Ministry of Trade, Industry, Regional Integration and Employment , Gambia Investment and Export Promotion Agency (GIEPA) National Association of Artisanal Fisheries Operators (NAAFO), Gambian Women Association of Fish and Vegetable Exporters, Association of Fish Processors and Exporters, Fish Smokers Association, Fish Driers Association, Ecotourism Society of The Gambia, The Gambia Federation of the Disabled (GFD, Tourist Taxi Drivers Association, Gambia Hotel Association, Juice Pressers Association, Ground Tour Operators Association, Restaurants and Night Club Association, Horse Riders Association, Gambia Hotel Training School	<i>Project description</i> <i>ESCP</i> <i>SEP including GM</i>	<i>Meetings, interviews</i>
Demand and destination assessment	Relevant parties: Ministry of Tourism and Culture , Ministry of Finance and Economic Affairs (MoFEA), Central Bank of The	<i>Project description</i> <i>ESCP</i>	<i>Field visits</i> <i>Consultations with the regional Governors and regional experts</i>

	Gambia, Gambia Tourism Boar (GTboard) National Environment Agency, Ministry of Transport, Works and Infrastructure, Ministry of Trade and Investment, Ministry of Lands, Regional Governors, local community leaders and organizations, GIEPA	<i>SEP including GM</i>	<i>Consultation meetings with communities Special meetings with vulnerable groups</i>
Coastal studies and modeling	Relevant parties: Ministry of Tourism and Culture, Ministry of Finance and Economic Affairs (MoFEA), Central Bank of The Gambia, Gambia Tourism Board, National Environment Agency, Ministry of Transport , Works and Infrastructure, Ministry of Trade Industry, Regional Integration and Employment , Ministry of Lands and Regional Government, Regional Governors, Gambia Investment and Export Promotion Agency (GIEPA), National Environment Agency, Fishers, Fish Processors and Exporters, vendors in the tourist craft markets, Gambia Hotel Association.	<i>Project description</i> <i>ESCP</i> <i>SEP including GM</i>	<i>Meetings Video conference Field visits Consultation meeting with communities Special meeting with vulnerable groups</i>
<i>Implementation</i>	<i>General Public</i> <i>Vulnerable Individuals and Groups</i> <i>Sector Workers</i> <i>Project Workers</i>	<i>Project description</i> <i>ESCP</i> <i>SEP</i> <i>GM</i> <i>LMP</i>	<i>Press releases</i> <i>Information leaflets</i> <i>Radio, television, newspaper and social media announcements, considering stakeholders do not have access to online channels or do not use them frequently</i> <i>Focus groups with affected parties and vulnerable groups</i> <i>Community consultation meetings (where feasible)</i>

			<i>Toll-free hotline for information dissemination and grievance uptake</i>
<i>Closure</i>	<i>General Public</i> <i>Project Workers</i>	<i>Progress and Evaluation Reports</i>	<i>Press releases</i> <i>Information leaflets</i>

The table above contains broad stakeholder categories and project phases, as well as an indicative (non-exhaustive) list of methods - which should be adapted according to circumstances related to the project phases and the needs of the various stakeholder groups. The current situation of the COVID-19 pandemic must always be considered when defining the project's actions and activities. The updated SEP will contain more details.

3.4. Proposed strategy for information disclosure and consultation process

Stakeholder engagement activities must be inclusive and carried out in a culturally sensitive manner, and care must be taken to ensure that the vulnerable groups identified above have opportunities to be included in the consultations and benefits of the project. Methods often include family outreach and focus group discussions, as well as community public consultation meetings and, where appropriate, verbal communication or images should be used in place of text. The project will have to adapt to different requirements.

Given the on-going global pandemic and recent measures put in place to mitigate against transmission and public and worker safety, and the short timeline in which the project is being prepared, there are limited opportunities available to engage and consult with stakeholders during project preparation. Restrictions on social gatherings, which limit face-to-face social interactions, will constrain the project's stakeholder engagement processes and require the implementation of innovative communication and consultation methods. While there are numerous stakeholders (both direct and indirect) who will be affected or benefit from this project, it may not be possible to reach them all, given the current context. To help address this situation will require adopting a communication and information strategy that will allow community engagement in line with national and WHO guidelines as well as W/Bank technical guidelines on the prevention of the spread of COVID-19.

As indicated above, it may be necessary to:

- Diversify means of communication and rely more on social media (such as WhatsApp and Facebook) based on the type and category of stakeholder's access to digital technology and connectivity;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements, and mail) when stakeholders do not have access to online channels or do

not use them frequently. Such channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;

- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project. Webex, Skype, and in low ICT capacity situations, audio meetings, can be effective tools to design virtual workshops. The format of such workshops could include the following steps:
 - Virtual registration of participants: Participants can register online through a dedicated platform.
 - Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics: These can be distributed online to participants.
 - Review of distributed information materials: Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.
 - Discussion, feedback collection and sharing:
 - Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this.
 - Group, team and table discussions can be organized through social media means, such as webex, skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.
 - Conclusion and summary: The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions, and share electronically with all participants.

In situations where online interaction is challenging, information can be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp groups, Project weblinks/ websites, and traditional means of communications (TV, newspaper, radio, phone calls and mails with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.

The environmental and social risk management instruments for the project will be disclosed prior to public consultations, which are to take place no later than within Thirty (30) days of the project’s Effectiveness Date.

3.5 Future of the project

Stakeholders will be kept informed as the project develops, with reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism.

PPA phase is expected to take place as soon as possible, and this phase is expected to last three to four months, Inclusive and participatory stakeholder consultation and appropriate and timely dissemination of information, should occur throughout the life of the project. The grievance mechanism should be accessible to affected parties and project workers throughout the entire duration of the project, and during a period of at least six months following closure.

4. Resources and Responsibilities for implementing stakeholder engagement activities

4.1. Resources

The Ministry of Tourism and Culture which will house the PIU will be responsible for the stakeholder engagement activities for the PPA. The budget for the project-SEP will be calculated and included in the updated SEP. The budget for the implementation of the SEP will be financed by resources from the PPA under Activity 7.

4.2. Management functions and responsibilities

The Ministry of Tourism and Culture will work closely with other agencies, institutions, delegations, ministries including the Ministry of Finance on project implementation. The staff of the PIU will include subject technical experts including in project implementation, environmental and social safeguards, and monitoring and evaluation. Once the Project becomes effective, the Project may also hire short-term consultants to support implementation as needed.

The PIU will be responsible for carrying out stakeholder engagement activities, while working closely with other government entities, as well as local government units, media outlets, health workers, etc. The stakeholder engagement activities will be documented via quarterly progress reports, to be shared with the World Bank.

5. Grievance Mechanism

A grievance redress mechanism (GM) will be implemented at the project level to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM will provide a transparent, inclusive, and credible process for fair, effective, and lasting outcomes. It is an integral component of community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for presenting a complaint, request for information/clarification, or resolving any dispute that may arise during the course of the implementation of the project;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

5.1. Description of GM

Grievances will be handled at the national level by the Ministry of Tourism and Culture. The GM will include the following steps:

Step 1: Grievance received and registered by (the Deputy Permanent Secretary, MoTC, Mr. Mamadi Dampha, Focal Point for the project.

Step 2: Acknowledge, assess and assign

Step 3: Develop and propose a response

Step 4: Communicate proposed response to complainant and seek agreement on the response

Step 5: Implement the response to resolve the grievance

Step 6: Review the response if unsuccessful

Step 7: Close out or refer complainant to judicial process

Once all possible redress measures have been proposed and the complainants are still not satisfied, they should be advised of their right to legal recourse.

Table 2. Grievance Management Process (for non-sensitive/GBV/SEA/SH related complaints)

Process	Description	Time Frame	Other Information
Identification of grievance	Face to face; telephone; letter; mail; e-mail; website; recorded during public/ community interaction; others The grievance can also be passed through other parties, such as the chief office because the public are more conversant with this office.	1 Day	Email address; hotline number
Grievance assessed and logged	Significance assessed and grievance recorded or logged (i.e. in an e-registry and paper registry) It will be prudent to have a grievance record book where the grievances are recorded for follow up. Grievances concerning sexual exploitation and abuse/gender-based violence should be treated as confidential. Only the nature of the complaint and the processing outcome should be recorded.	3-6 Days	Significance criteria: <ul style="list-style-type: none"> • Level 1 –one off event; • Level 2 – complaint is widespread or repeated; • Level 3- any complaint (one off or repeated) that indicates breach of law/ policy
Grievance is acknowledged	Acknowledgement of grievance through appropriate medium	3 Days	
Development of response	Grievance assigned to appropriate party for resolution Response development with input from management/ relevant stakeholders	4-8 Days	
Response signed off	Redress action approved at appropriate	8-15 Days	
Implementation /communication of response	Redress action implemented and update of progress on resolution communicated to complainant	5-9 Days	

5.2 Venues to register Grievances - Uptake Channels

A grievance can be registered directly at the project action sites, means for registering grievances will be created and/or in any of the following ways and, if necessary, anonymously or through a third party.

- By telephone at: 4224756/ **+220 9166806/ 6166806** [toll free to be established Thirty (30) days after approval of the PPA]
- By e-mail to [mdampha45@gmail.com]
- By complaint form (See Annex 1)
- By personal meetings

- Once a complaint is received, it must be recorded in the Complaints Logbook or Complaints Database (see Annex 2)

5.3 Grievances Relating to Gender-Based Violence (GBV)

In addition, specific procedures will be developed to address complaints related to sexual exploitation and abuse/sexual harassment (SEA/SH) in a rapid (within 72 hours), survivor-centered, ethical, confidential, and non-discriminatory manner. It will also include an accountability framework and a response protocol that includes referrals to GBV services. Consultations with women shall take place regularly during the life of the project to ensure that the mechanism designed to handle complaints related to SEA/SH is accessible and that the services provided are adapted to the needs of survivors.

There will be specific procedures in place for addressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), with confidentiality provisions as well as safe and ethical documenting of SEA/SH cases. Multiple channels will be in place for a complainant to lodge a complaint relating to SEA/SH. GM-specific considerations for dealing with GBV under project actions are:

- Establishment of a separate channel to handle SEA/SH GM complaints effectively and efficiently in a confidential, ethical, and survivor-centered manner. This will be managed by a dedicated SEA/SH GM operator housed within the PIU or if necessary, by an NGOs (whose terms of reference and qualifications will be assessed by the Bank). The PIU including the SEA/SH, E&S specialists shall be trained on how to document SEA/SH cases;
- Establishment of a separate channel to handle SEA/SH-GM complaints effectively and efficiently in a confidential, ethical, and survivor-centered manner. This will be potentially managed by a dedicated SEA/SH GM operator housed within the PIU, with feedback to the project's GM; operators. The focal point should be trained on how to document SEA/SH cases in a confidential and empathetic way. The project is to make available multiple complaints channels;
- No identifiable information on the survivor should be stored in the GM logbook or database; records shall be stored in a separate and secure system to prevent exposure of identity
- The GM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

The GM should have in place processes to notify immediately within 48 hours both the PIU and the World Bank of any SEA/SH complaints with no distinguishing information shared about the survivor. A standard incident/accident notification form shall be sent to all subcontractors and suppliers. Any notification of an incident of SEA/SH shall follow the information sharing protocol to respect the safety and confidentiality of the survivor (**information shall include: date of receipt of the incident; date of the incident; type of SEA/SH reported; age/sex of the survivor; whether or not the incident is related to the Project and if the survivor was referred to services**).

6. Monitoring and Reporting

6.1. Involvement of stakeholders in monitoring activities

Bi-monthly reports for SEP implementation, including grievance management, will be prepared and key indicators monitored by the implementation team at the PIU.

Quarterly stakeholders’ meetings will be convened to discuss and review key stakeholder engagement indicators. Stakeholders (affected and interested parties) will be given opportunities to indicate whether they are satisfied or not with the project consultation process and what should be changed in the SEP implementation process so as to make it more effective.

The project evaluation (external and internal review) will include aspects of the stakeholder engagement plan (notably key SEP indicators and activities) and recommend improvements.

6.2. Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary during project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that 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 the project related activities and to its schedule will be duly reflected in the SEP. Monthly summaries and internal reports on grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. 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 may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project’s interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis

Further details will be outlined in the updated SEP, to be prepared within 30 days of project Effectiveness.

Annex1. Complaint Filing sheet (to be used with grievance register in Annex 2)

Complaint Intake Form	
Date submitted:	
Location where complaint is being lodged:	
File No.	
Name of person receiving complaint:	
Complainant Information	

Name of complainant:	
Contact information (email/address/phone):	
Preferred method of contact:	Email <input type="checkbox"/> Mail <input type="checkbox"/> Phone <input type="checkbox"/> SMS <input type="checkbox"/> WhatsApp <input type="checkbox"/> Other _____
Information about complaint/grievance/question	
Related to land and/or property affected (or physical and/or economic displacement?)	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, land and/or other property affected _____
Topic of complaint:	
Description of the Complaint (if available, include photos, documents, or other supporting documents as an attachment)	
Signature of complainant:	
Section for manager assigned for the complaints record	
Name of manager:	
Complaint number:	
Complaint resolution deadline:	

Decision Outcome (include names of participants and date of decision)	
Communicated resolution to complainant Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, what was the response of the complainant:	
Any follow up action required? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, what and who will follow up and communicate outcome to complainant and by when?	
Complaint registered in logbook?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Additional observations/comments by manager:	
Signature of Manager:	

Annex 2 Grievance Log (for non-SEA/SH complaints)

Case no.	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
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