



**REPUBLIC OF THE GAMBIA**

**Ministry of Information & Communication Infrastructure  
GRTS Building  
MDI Road Kanifing**

**WEST AFRICA REGIONAL DIGITAL INTEGRATION PROJECT**

Project Preparatory Advance (PPA)

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**December 2021**

**I. Introduction**

This version of the Stakeholder Engagement Plan (SEP) is based on the activities envisaged under the Project Preparatory Advance (PPA). MOCI will update this SEP 30 days after the start of PPA activities to cover the activities envisaged for the main project. The SEP will be reviewed and updated on a regular basis, if necessary. All activities financed by the PPA will be implemented by the MOICI

## 2. Brief description of WARDIP

The Government of The Gambia has requested funds from the World Bank (WB) to implement the West Africa Regional Digital Integration Project (WARDIP) to a tune of \$ 45 million for a period of five years. Part of the funds, mounting to \$1.5 million will be used as the Project Preparatory Advance (PPA). The Project Development Objective (PDO) is to increase access to broadband and digital services through the development and integration of digital markets in the Western Africa region. The Project components are the following: (i) Connectivity Market Development and Integration; (ii) Data Market Development and Integration; and (iii) Online Market Development and Integration.

The PPA will be implemented by the Ministry of Information and Communication Infrastructure (MOICI). Currently, the Environmental and Social Commitment Plan (ESCP) and the Stakeholders Engagement Plan (SEP) are being prepared to access the PPA. MOICI will prepare safeguards instruments, recruit project managers, professional staff and technical assistants (individuals and firms) for inputs specifically related to project design and preparation.

**Project Beneficiaries.** Key projects beneficiaries would be the Ministries, Departments and Agencies, Private Sector such as the ISPs, Telcos, and other private actors in the ICT sector. Other beneficiaries would be Gambia's public research and education institutions including Universities, nongovernmental and civil society organizations. A detailed result monitoring framework and indicators will be developed during project preparation.

***The WARDIP PPA proposes to focus mainly on the following preparatory activities:***

- (i) Consultancy studies on thematic areas of the proposed project intervention focusing on the following:
  - Consultant supporting team for Project Preparation (preparation of the ToR, consultations, field visits, and preparation of Project Appraisal Document);
  - Consultant supporting Preparation of the Project Implementation/Operation Manual (PIM/POM)
  - Consultant supporting Feasibility Study for Submarine/terrestrial Cable
  - Consultant supporting Assessment of e-Government Infrastructure and Services
  - Consultant supporting Preparation of PIM/POM
  - Consultancy for preparation of the Project Implementation Manual (PIM) - administrative, financial and accounting procedures, procurement, monitoring and evaluation;

- Consultancy for safeguard document preparation:
    - Environment and Social Management Framework (ESMF), including a social assessment and SEA/SH risk assessment and Action Plan
    - Labour Management Procedure (LMP);
    - Resettlement Framework (RPF) acceptable to the Bank;
    - Stakeholder Engagement Plan (SEP) including a project level grievance mechanism (GM).;
    - Environmental and Social Commitment Plan (ESCP) will be prepared by the project team with support from consultants;
    - Update and disclosure of the Stakeholder Engagement Plan (SEP) for the project;
    - Prevention of gender-based violence; sexual exploitation and abuse.
  - Consultancy to provide training for relevant MOICI staff and key stakeholders and contractors on environmental and social safeguards, GM and their implementation; and other subjects prioritized in the Training Plan.
  - Consultancy for Project Procurement Strategy for Development (PPSD);
  - Recruitment of key staff for the Project including an environmental specialist and a social specialist ;
- (ii) Development of Project Procurement Strategy for Development (PPSD);
- (iii) Workshops and consultation meetings.

## 2. Objectives

The project preparation phase is carried out based on the Environmental and Social Framework of the World Bank (ESMF). According to the environmental and social standard ES 10 relating to stakeholder engagement and information dissemination, the Project Implementation Unit (PIU) will prepare a communication strategy to provide stakeholders with understandable information on the project. and accessible and will consult them in a culturally appropriate form, free from manipulation, interference, coercion, discrimination, and intimidation.

The main objective of the stakeholder mobilization plan is to identify and mobilize all stakeholders, decentralized government services, MOICI, the regulatory authority, telecom operators, traditional and local authorities, individuals, groups of individuals, affected communities, civil society and local NGOs concerned by Project preparation activities and who must be involved in the implementation of the SEP.

The SEP helps to clarify the ways and means by which the project will communicate with the various stakeholders and the mechanism by which they can raise issues and formulate complaints.

The involvement of stakeholders will ensure good collaboration between the communities and the PIU to minimize and mitigate the environmental and social risks of the Project and to achieve its objectives.

## **2. Summary of past stakeholder engagement activities**

To date, no stakeholder engagement activities have been carried out, at least as part of this project. However, stakeholder engagement activities will begin during the preparatory phase of the project.

### 3. Stakeholder identification and analysis

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

**Table 1:** PPP Activities Submitted for Consultation

Activities	Stakeholders	Means of communication
Recruitment of consultants for the preparation of project documents, including an environmental safeguard Specialist and a social safeguard Specialist	<p><b>Relevant parties:</b> Private Sector, Ministry of Environment and Climate Change, Public Utility and Regulatory Authority (PURA), Ministry of Transport, Works and Infrastructure and other relevant institutions for mobilizing, facilitating, and monitoring private investments in ICT and Gambia Chamber of Commerce and Industry, ICT SMEs, women’s groups, youth groups,</p> <p><b>Interested parties:</b> experts in relevant fields, consulting firms, and nongovernmental and civil society organizations, etc.</p> <p><b>Vulnerable parties:</b> women, young people, and the elderly, poorest households.</p>	<p>Meetings on guidelines, interviews, official letters, emails, public announcements through the TV/radio/website/newsletter.</p> <p>The means of communication for adaptation to COVID-19 will be done in a virtual way for relevant stakeholders and experts in the fields.</p> <p>On the other hand, for vulnerable people, measures of social barriers/distance will be strictly respected.</p>
Preparation of the project documents including environmental and social management instruments.	<p><b>Relevant parties:</b> direct workers of the Project, the Project Executing Agencies, the Territorial Communes, the communities, the customary authorities and the population located near the sites of the sub-projects</p> <p><b>Interested parties:</b> Private Sector, Ministry of Environment and Climate Change, Public Utility and Regulatory Authority (PURA), Ministry of Transport, Works and Infrastructure and other relevant institutions for mobilizing, facilitating, and monitoring private investments</p>	Consultations with affected parties during the preparation phase of safeguards documents according to the methodology described below and following wide dissemination of relevant information and documents.

	<p>in ICT and Gambia Chamber of Commerce and Industry, ICT SMEs, women's groups, youth groups.</p> <p><b>Vulnerable parties:</b> women, young people, and the elderly, poorest households.</p>	
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#### 4. Stakeholder Engagement Program

The stakeholder engagement program at this stage includes the activities proposed under the PPA and will be reviewed during project preparation and before project approval.

Table 2 Summarizes actions proposed by stakeholders by activities:

**Table 2:** Detailed Activities and Consultations

<b>Activities</b>	<b>Topic of consultation</b>	<b>Method used and proposed schedule</b>	<b>Targeting stakeholders</b>	<b>Responsibilities</b>	<b>Disclosure of information</b>
Recruitment of consultants for the preparation of project documents, including environmental and social management instruments.	Project information, Eligibility criteria, expected tasks, expected deliverables, schedule, fee negotiation and expenses, Grievance Redress mechanism, gender-based violence, Mitigation measures. This should be done at a smaller level by (MOICI, Consultants)	Email correspondence and videoconferencing meetings. Interviews with experts in the ICT at the level of Ministries and departments. Virtual and physical consultation meetings.	Interested parties and other institutional stakeholders.	The MOICI will be responsible for coordinating and ensuring that appropriate consultations are conducted.	Public announcements through TV/radio/print/website/newsletter/ Flyers.
Consultations during the elaboration of environmental and social instruments	Project information, Eligibility criteria, expected tasks, expected deliverables,	Email correspondence and videoconferencing meetings. Interviews with experts in agribusiness value	Interested parties and other institutional stakeholders,	MOICI will be responsible for coordinating and ensuring that appropriate	Public announcements through TV/radio/print/website/newsletter/ Flyers.

Activities	Topic of consultation	Method used and proposed schedule	Targeting stakeholders	Responsibilities	Disclosure of information
	<p>schedule, fee negotiation and expenses, Grievance Redress mechanism, gender-based violence, Mitigation measures. This should be done by Consultants</p>	<p>chain development at the level of ministries and departments. Virtual consultation meetings. Focus group meetings and public meetings at the community level (see table 3 on how the information will be shared)</p>	<p>including, Ministry of Environment and Climate Change, Public Utility and Regulatory Authority (PURA), administrative authorities, territorial authorities, direct project workers, youth and women's leaders, opinion leaders, non-governmental organizations (NGOs) and civil society (SC).</p>	<p>consultations are conducted.</p>	

The PPA will cover activities to be carried out to support the preparation of the Project. Comments provided during the above consultations will be reviewed by the (MOICI) and dealt to addressed promptly within a reasonable period of two (2) weeks after receiving comments. The SEP for all main project activities will be prepared and disclosed before Project Appraisal.



### **Proposed Strategy of information's dissemination**

- Describe the information that will be communicated.
- Define communication formats, and
- Define the modes of communication

The following methods will be used to inform stakeholders of the ongoing engagement process.

Table 3. Methods used to inform stakeholders of the ongoing engagement process

Method of mobilization	Appropriate application of the method
Correspondence, emails, telephones	<p>Provide information to stakeholders, especially those concerned (MOICI, WB, PURA, OPERATORS, CIVIL SOCIETY, NGOs, direct Project workers, Project Executing Agencies, municipalities, communities, customary authorities and population located close to the sub-project sites).</p> <p>Invite stakeholders to meetings and follow-up.</p>
Individual meetings	<p>Opinion research.</p> <p>Allow stakeholders to speak freely on sensitive issues.</p> <p>Build personal relationships Record meetings.</p>
Formal Meetings	<p>Present project information to a group of stakeholders.</p> <p>Allow the group to make comments which will be recorded.</p> <p>Build impersonal relationships with high level stakeholders.</p>

Public meetings	<p>Present project information to a group of stakeholders, especially local communities.</p> <p>Allow the group to make comments which will be recorded.</p> <p>Build relationships with communities, especially those affected by the project.</p> <p>Build special relationships with vulnerable people from communities affected by the project.</p> <p>Provide non-technical information.</p> <p>Facilitate meetings with POWER POINT presentations, posters, etc.</p> <p>Reporting of discussions, comments and questions.</p> <p>For measures to prevent COVID-19, measures will be taken to avoid and minimize public gatherings such as community meetings, seminars and workshops by complying with national rules for prevention and advice in this area.</p>
Focus group meetings	<p>Present project information to a group of stakeholders, especially local communities.</p> <p>Allow the group to make comments and give their opinions which will be carried over.</p> <p>Build relationships with communities Report answers to different questions.</p>
Project Website	<p>Present project information and progress updates.</p>

## 5. Complaint Management and Resolution Mechanism

The West Africa Regional Digital Integration Project specific Grievance Mechanism will be in operational and will be updated to be adapted to the operational context of WARDIP prior to project inception to ensure that grievances and suggestions raised are addressed within a timely manner and be used to improve project results. The GM will be monitored by the environmental and social specialists. Then the Local Complaint Management Committee is the first level of conflict resolution. group (3 to 7 members). The second level is Representatives of members of the National Coordinating Organization for Farmer Associations. In the event of a deadlock on the first two levels. The Chairperson/Mayor assisted by the councillors of the Local Government Area will take over in order to resolve these conflicts amicably. If the amicable route fails or if the applicant is not satisfied, he or she can take the matter to court as a last resort.

To do this, the project will have a register to record complaints. In addition, a form will be made available to the public (through the and on the Ministry of Information & Communication Infrastructure website and social networks) which can be used to request information and submit complaints and/or suggestions. In addition, specific procedures will be developed to deal with complaints of gender-based violence (GBV). A separate GM will be developed by the project to address workers' complaints (in accordance with national labour laws and ISS2).

Within the framework of the PPA, the handling of complaints will be done by MOICI. The management of PPA complaints will be done in a manner that respects the local culture, is discreet, objective, sensitive and responsive to the needs and concerns of the parties affected by the project.

This mechanism will also allow for the filing and examination of anonymous complaints. To ensure that a complaints system is effective, reliable and operational, the following fundamental principles must be respected: Stakeholder participation must be continuously involved in project activities (from conception to implementation); the contextualization of GM; the complainants' sense of security; confidentiality, transparency, accessibility and speed in the handling of complaints.

Learning from other projects GRM, six steps to follow in the process of submitting and resolving proposed grievances.

**Table 4.** Complaint Management Procedures

Steps	Actors	Procedures
<b>1st Steps</b>	A Local Complaint Management Committee is the first level of conflict resolution. group (3 to 7 members): neighbourhood elders assisted by community leaders and people working in the Agriculture sector	Meeting once a week Meeting whenever necessary
<b>Step Two</b>	In the event of a deadlock on the first level. The Chairperson/Mayor assisted by the councillors of the Local Government Area will take over in order to resolve these conflicts amicably.	Meeting whenever necessary
<b>Step Three</b>	If the amicable route fails or if the applicant is not satisfied, at the first two levels, the matter can be taken to Alternative Dispute Resolution Secretariat (ADRS)	Meeting once a month

Steps	Actors	Procedures
	Local mechanisms, i.e., sub-projects, remain the main instrument for submitting and investigating complaints in relation to sub-projects	
<b>Step Four</b>	If the amicable route fails or if the applicant is not satisfied, he or she can take the matter to court as a last resort. Local mechanisms, i.e., sub-projects, remain the main instrument for submitting and investigating complaints in relation to sub-projects	
<b>Step Five</b>	<p><b>Monitoring and Evaluation, will be provided by:</b></p> <p>Experts in environmental and social protection of the project</p> <p>Attention will be paid to all complaints particularly complaints from vulnerable people.</p> <p><b>Communication Feedback</b></p> <p>The feedback will be made by direct information to the complainant by the environmental and social safeguard experts of the Project by telephone, or by written response.</p> <p><b>Tracking indicators</b></p> <p>Indicators to follow for the management of the grievance mechanism</p> <ul style="list-style-type: none"> <li>○ Type of sub-project:</li> <li>○ Number of complaints received:</li> <li>○ <i>Number of complaints resolved:</i></li> <li>○ <i>Number of unresolved complaints:</i></li> <li>○ Response time:</li> </ul> <p>Number of cases where solutions have resulted in appeals by complainants:</p> <p>Channels used by the complainant to convey complaints through:</p> <p>In person, Phone, SMS/text, Email and/or Snail mail.</p>	Quarterly meeting
<b>Step Six</b>	<p><b>Final decision</b></p> <p>Once the complaint is filed, the complainant will be in direct contact with the <b>WARDIP Implementing team</b> who will provide the answer in the most appropriate way to the circumstances.</p>	

### GM related to GBV/ SEA/SH

**In its action plan, the project will put in place a mechanism to contribute to the prevention and management of GBV, SEA, SH.**

The PIU under MOICI of the project will also put in place a plan to mitigate the risks of GBV, SEA, SH through flagship actions as recommended by the World Bank Good Practice Note in this area. This plan will also include a monitoring and evaluation system which will be required

to ensure the quality of the process for implementing the measures and the effectiveness of the results.

Monitoring indicators for GBV, SEA, SH mitigation measures will be defined and monitored in accordance with the Good Practice Note on SEA, SH at the Bank level.

The mechanism for preventing and taking care of GBV during the implementation of the Project will be based mainly on the following pillars:

- Development and signature of individual and collective Code of conduct including clear sanctions.
- Training of stakeholders on GBV, SEA, SH including GBV focal points in communities intervening in the GM.
- Mapping and assessment of GBV / EAS / HS case management capacities of service providers and implementing agencies.
- Support for the provision of emergency kits.
- Communication: dissemination of the system and information / sensitization of stakeholders, including affected communities, on the principles and procedures for reporting, but also providers of GBV care services as well as the services that will be offered there.
- Establishment of a monitoring and evaluation mechanism for the GBV, SEA, SH Action Plan.

It should be noted that the current context of the project, preparation phase (PPA), will not have to cause cases of violence such as physical, sexual and economic violence.

**Appendix 1. Complaint Filing sheet**

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Date: \_\_\_\_\_

Region-----

File No.-----

**Complaint**

Complainant's name

Address:

District -----

Land and/or other property affected \_\_\_\_\_

**DESCRIPTION OF THE COMPLAINT:**

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----- (Photos, documents, or other supporting documents should be included as an attachment)

Made \_\_\_\_\_ to-----

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Complainant's signature

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The manager assigned for the complaints record

Complaint number:

The date the complaint was received:

Complaint deadline:

Name and Signature of the Manager:

**OBSERVATIONS:**

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Made to-----

\_\_\_\_\_  
Signature