REPUBLIC OF THE GAMBIA

THE WESTERN AFRICA REGIONAL DIGITAL INTEGRATION PROGRAM – WARDIP (P176932)

Stakeholder Engagement Plan (SEP) *including the* Grievance Mechanism (GM)

Final Report

August 2023

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ABBREVIATIONS AND ACRONYMS

ACE	Africa Coast to Europe
AIDS	Acquired Immune Deficiency Syndrome
CBG	Central Bank Gambia
CBO	Community Based Organization
COVID-19	Coronavirus Disease 2019
DFS	Digital Financial Services
DLS	Department of Lands and Surveys
ECOWAN	ECOWAS Wide Area Network
ECOWAS	Economic Community of West African States
EIA	Environmental Impact Assessment
ESMF	Environmental and Social Management Framework
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
FGD	Focus Group Discussion
GBA	Greater Banjul Area
GBV	Gender Based Violence
GCCI	Gambia Chamber of Commerce and Industry
GIEPA	Gambia Investment and Export Promotion Agency
GM	Grievance Mechanism
GoTG	The Government of The Gambia
GRC	Grievance Resolution Committee
GSC	Gambia Submarine Cable Company Ltd.
HIV	Human Immunodeficiency Virus
ICT	Information Communication Technology
ISP	Independent Service Providers
KII	Key Informant Interview
KPI	Key Performance Indicators
LGA	Local Government Authorities
MoFEA	Ministry of Finance and Economic Affairs
MoCDE	Ministry of Communications and Digital Economy
MOTIE	Ministry of Trade Industry and Employment
NaNA	National Nutrition Agency
NEA	National Environment Agency
NGO	Non- Government Organization
NRA	National Roads Authority
PAD	Project Appraisal Document
PAP	Project Affected Person
PIU	Project Implementation Unit
PPP	Public Private Partnership

PURA	Public Utilities Regulatory Authority
PDO	Project Development Objective
POM	Project Operational Manual
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SDM	Single Digital Market
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SOP	Series of Projects
SSCT	Sexual Exploitation and Abuse/Sexual Harassment Compliance Team
STD	Sexually Transmitted Diseases
UTG	University of The Gambia
VAC	Violence Against Children
VDC	Village Development Committee
WDC	Ward Development Committee
WARDIP	West Africa Regional Digital Integration Project
WCR	West Coast Region

GLOSSARY OF KEY TERMS

Consultation: The process of gathering information or advice from stakeholders and taking these views into account 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 impacted 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 from citizens, stakeholders, and other 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; These include workers, local communities directly affected by the project and other stakeholders not directly affected by the project but that have an interest in it, e.g., local authorities, neighboring projects, and/or nongovernmental organizations, etc.

Stakeholder Engagement Plan: A plan which assists investors with effectively engaging with stakeholders throughout the life of the project and specifying activities that will 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 process. 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 might 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.

1. INTRODUCTION

The Government of The Gambia has obtained financing from the World Bank for the implementation of the Western Africa Regional Digital Integration Project, The Gambia (WARDIP). The project is regional covering The Gambia, Guinea and Mauritania and the overall 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. In addition to strengthening the connectivity agenda in the Region, the project will address the "soft issues" to foster a regional Single Digital Market (SDM). This would include enhancing policy and regulatory harmonization and strengthening the role of regional technical bodies to help coordinate and advise the participatory countries to achieve this agenda.

At the regional level, financing will be provided to the Economic Community of West African States (ECOWAS), to support the following activities: (i) development of regional regulatory framework when needed; (ii) monitoring of the implementation at the national level of regional frameworks; and (iii) capacity building/ support to national countries in trans positioning of the regional framework.

At the national level, WARDIP would enhance ongoing and planned national-level projects that support digital transformation in the region and fit into the above SDM framework but, it could also include more beneficiary/end-user focused activities to promote uptake and use of the digital services such as digital skills development, awareness campaigns around safe and productive use of the internet. Furthermore, national-level activities could include regulatory support (e.g. infrastructure-sharing, universal access, license and authorization procedures) that would prepare each country to better participate in and benefit from the emerging regional digital market.

Based on a Series of Projects (SOP) approach, countries and regional bodies could join in the future subject to the availability of IDA funds and meeting eligibility criteria. This approach helps to ensure coherence of interventions at country level to advance the objective of achieving a Single Digital Market in West Africa by 2030.

1.1 Project Objectives for The Gambia

The overall Project Development Objective is to increase access to broadband and digital services through the development and integration of digital markets in the Western Africa region. More specifically, the project will seek to :

- Develop a single connectivity market, which will remove barriers to regional telecoms infrastructure and services deployment to encourage investment, improve performance, eliminate pricing and quality differentials between coastal and landlocked countries, as well as expand access to connectivity to all.

- Develop a single data market, which will enable secure exchange, storage and processing of data across borders to support regional deployment and access to data-driven services and innovation.

- Develop a single online market, which will allow government, firms and individuals to access and deliver both public and private services online, as well as to make online sales and purchases seamlessly from anywhere in the region. Core enablers for the online layer are digital financial services (DFS), electronic commerce, and priority public digital services for regional integration.

For The Gambia, WARDIP will support the country to ensure an enabling environment for digital skills and innovation and competitiveness in the regional Single Digital Market. The new Ministry of Communications and Digital Economy (MoCDE), which replaces the Ministry of Information and Communication Infrastructure (MOICI) will now implement the project.

The project consists of the following components:

Component 1: Enabling environment for the establishment of a continental SDM (To be implemented by AU Commission and Smart Africa)

Component 2: Connectivity Market Development and Integration

This component would support reforms to reduce barriers to the provision of cross-border telecoms services through open markets as well as broadband connectivity infrastructure deployment under an MFD approach.

Component 3: Data Market Development and Integration

This component aims to enable secure exchange, storage and processing of data across borders to support regional deployment and access to data-driven services, innovation and infrastructure, including reducing regional restrictions on the free flow of data and increasing investments into data infrastructure. In line with regional goals, this component could potentially include support to national objectives, which would be critical to set the path for integration.[1] It is also worthy to note that energy efficiency considerations will be integrated in the procurement of hardware and software under this component.

Component 4: Online Market Development and Integration

The component aims to support the development and integration of the online market, which would enhance the enabling environment for the cross-border delivery and access of digital goods or services. This component would support governments, firms and citizens in participating countries to access and deliver private and public services online, as well as to make online purchases seamlessly from anywhere in the region.

Component 5: Project Management

This component will provide technical assistance and capacity support for program preparation and implementation. It would finance the operating costs of the Project Implementation Units (PIUs) for each participating country as well as a PIU embedded in the participating regional body. Support would be provided to ensure the establishment of adequate social and environmental safeguards capacity, as well as fiduciary and monitoring, and evaluation (M&E), for the implementation of activities.

Component 6: Contingent Emergency Response Component (CERC)

The objective of the zero-cost component is to allow a rapid reallocation of credit proceeds from other components to provide emergency recovery and reconstruction support following an eligible crisis or emergency. The component would finance public and private sector expenditures on a positive list of

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[1]National projects that are relevant to, and aligned with, the regional outcomes of this project may be added to this component.

goods or specific works, goods, services, and emergency operation costs required for The Gambia's emergency recovery. A Contingent Emergency Response Implementation Plan (CERIP) will apply to this component that details financial management, procurement, safeguards, and any other necessary implementation arrangements.

1.2 Project Beneficiaries

The project is expected to benefit the entire Gambia population of 2,416,664[2]. Nearly every current or future user of telecommunications and digital financial services will benefit from the legal and regulatory reforms aiming to reduce costs, improve quality of services, and stimulate investment and innovation. Businesses and individuals will be able to access public services and carry out transactions with the government and among themselves more efficiently and conveniently through online platforms. Individuals will have access to new training opportunities and support to help them find new digitally enabled jobs. Similarly, it will create opportunities for businesses to improve their productivity, tap new markets and secure more customers through training and support for technology adoption in online marketing and e-commerce. The project will also benefit the public sector through increased efficiency of the government's internal operations. Marginalized or vulnerable groups will also benefit, with rural and small communities having better access to services and digitally enabled jobs with minimal barriers of distance and transportation. Women and girls will be supported and encouraged to participate in digital skills and entrepreneurship opportunities in greater numbers, and digital public service offerings and training opportunities will be designed to ensure access to those with disabilities.

1.3 Summary of the main project activities

The project activities include the deployment of the submarine cable, the construction of a landing station for international connectivity, technical assistance and capacity building as well as public awareness and sensitization.

1.4 Project intervention zones

The project intervention zone will be mainly in the Greater Banjul Area where the landing station will be constructed and where most of the training and capacity building will be taking place and also where the headquarters of the major users will be located. Other parts of the country will also be targeted as part of the rollout of the Digital Addressing System.

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[2]Project Appraisal Document for the Western Africa Regional Digital Integration Program – SOP 1

Figure 1: Map of the coastal zone where the landing station can be located.
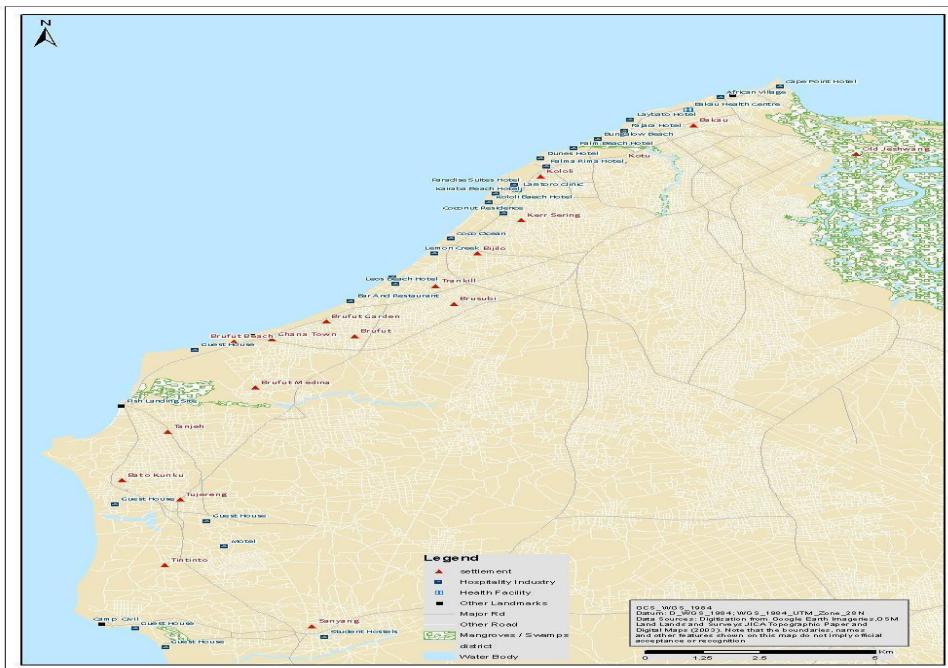
1.5 Potential Environmental and Social Risks and Impacts

The potential environmental and social impacts of this project are more thoroughly examined in the Environmental and Social Management Framework (ESMF), which is being prepared as a separate document for the project. The environmental and social risk rating of the project is **Substantial** (Substantial for environment and moderate for social including SEA/SH).

The environmental risks and impacts include:

- **Risk of dust and air pollution**

The construction of the landing station and the trenches for the cables will require the use of heavy trucks and machinery, which will raise dust and result in air pollution that can affect the health of the workers as well as the communities that live in the surrounding work sites.

- **Occupational health and safety risks like body injuries and fatalities.**

   The use of excavators, trucks, bulldozers, graders, rollers and water trucks on the construction sites can cause accidents resulting in body injuries and death.

- **Risk of pollution of the water bodies**

Improper management or handling of wastes and hazardous substances including used engine oil could lead to accidental spills or leaks, with potential contamination of soils, surface and groundwater. Poor human waste management could also lead to pollution in adjacent water sources.

- **Risk of destruction of Cultural Heritage/ Archaeological resources**

Construction operations may encounter cultural and archaeological resources which need to be handled properly in a transparent manner to avoid losses to the community. Once the first stages of earthworks

show signs of likely presence of archaeological resources, these should be salvaged through quick excavation to remove the artifacts and or other traces of human settlement before extensive earthmoving continues.

- **Increase of E-waste generation**

The project is expected to significantly increase the circulation of smart devices as well as purchase of IT equipment (e.g. computers, servers) all of which will lead to e-waste generation. In addition, old IT equipment and mobile phones which also contribute significantly to generation of e-waste need to be safely disposed of.

The social risks and impacts include:
- **Risk of loss of land and other assets or restriction of access to livelihood**
  Associated with the construction of the landing station and the trajectory for the fiber cable connecting the station to the shore where the submarine cable terminates will require land which may have to be obtained through compulsory land acquisition, which will result in the loss of land or restriction to the source of livelihood.
- **Risk of exclusion of vulnerable and disadvantaged groups and individuals**
  In the consultations relating to land acquisition issues since some of the potential land required may include land already subject to seasonal farming or vegetable growing by women.
- **Risks of Communicable Diseases including COVID-19, sexually transmitted diseases (STDs) and sexually transmitted infections (STI)**
  The construction work will take place in communities living or working close to the tourism area and the arrival of project workers in these communities may increase the risk of contact with a wider population which increases the risk of spread of COVID -19 and the transmission of STDs
- **Risks of SEA/SH and VAC- during the implementation and operational phase,**
  The high level of poverty in the country puts women and children at risks of SEA/SH due to the massive influx of labor as the construction areas are close to sites used daily by women in their activities. In addition, DHS Data (The Gambia, Demographic Health Survey, 2019), reveals that gender-based violence (GBV) remains highly prevalent in The Gambia.
- **Labor risks**
  Relate to discriminatory and non-transparent recruitment and management of workers as well as the risks of child labor.
- **Risks discrimination in the selection of female participation in the ICT training programs**
  The project has many capacity building programs, which could be of interest to female government employees and women entrepreneurs. There is also the exposure of women and girls to SEA/SH due to close interactions with men. The absence of SEA/SH mitigation measures to prevent and respond to this category of violence can increase the risk of discrimination.

2. BRIEF SUMMARY OF STAKEHOLDER CONSULTATIONS DURING PROJECT IDENTIFICATION AND PREPARATION STAGES

The preparation phase of the project included stakeholder engagement with both direct and indirect stakeholders. The purpose of these consultations was to inform stakeholders about project activities, risks, impacts, and opportunities, and receive their feedback about their needs, concerns and suitable formats for consultation to help shape project design. **Table 1** below gives a summary of these Consultations with a more detailed summary in **Annex 4.**

Table 1: Summary of stakeholder consultation during project identification and preparation

Date	Nature of Meeting	Participants	Topics Discussed	Conclusions/Recommendations
9-11/2/ 2022	Virtual identification mission meeting	Ministry of Communications and Digital Economy, Min. of Finance & Economic Affairs, The Gambia Competition and Consumer Protection Commission, PURA MOTIE & GIEPA	Identification of mission for the proposed West Africa Regional Digital Integration Project(P176932)	
4/3/2022	Inaugural meeting with client	MoCDE , NaNA Project Preparation Unit & Consultant	Review of the TOR for the study to confirm common understanding, preliminary identification of stakeholders, and discussion of logistics arrangements and documentation requirements. Land requirements for the project. Institutional capacity for risk management.	It was not clear whether the current landing station would be used. Low capacity but the recruitment process for the environment and social specialists have started
7/3/2022	Consultative meeting	GAMTEL Senior Management	Role of GAMTEL as the manager of ICT infrastructure. Current backup using Senegal are limited and expensive with security implications-thus the need for a second national backup for ACE. This will minimize interruptions and costly diversions through Senegal Importance of regular consultations with MoCDE and other stakeholders during project preparation and implementation on a monthly basis.	The consultant confirmed that the essence of the present exercise is to explore a responsive communication plan for a more effective stakeholder participation. Depending on the stage of development regular consultations through a structured framework will be carried out.
7/3/22	Interview	Director ICT- Public Utilities Regulatory Authority	Role of the agency in the ICT sector and the challenges currently faced which include coordination of key institutional actors and the absence of important regulatory frameworks to guide the development of the sector, which the project should address. The Director also emphasized the need for active private sector participation.	It is important for the project to ensure close consultations with the stakeholders, particularly the major service providers and potential investors .

8/3/22	Interview	Chairman, Gambia ICT Agency (GICTA)	Explained the Act to establish the Board of CITCA was enacted in 2019 and the Board has six members. Aim to oversee all ICT activities of the government and provide clearance. The Board is not yet operational	Although the agency is not yet operational it will be necessary to regularly engage them in the project activities in view of the important role they will be required to perform.
9/3/22	FGD	AFRICELL-CEO & Technical Director and the Consultant	Welcome the project particularly the PPP approach. Increased bandwidth should facilitate expansion and increased access to the internet. At the same time efforts should be made to strengthen the local backbone (ECOWAN) to carry the increased traffic. There is a need for more regular communication between the policy makers and the private sector and a regular reporting system should be in place during implementation of this project at least on a quarterly basis. Also ensure competent companies are hired to do the work	
9/3/22	Interview	COMIUM Technical Director & IT/ISP Manager and Consultant	Welcome the project as something long overdue. Leasing of fiber from Senegal is expensive which affects the company's ability to expand. Hope with more bandwidth consumers will have better service at reduced costs. Expressed the need for a more regular consultations and information sharing	The consultant confirmed the importance of regular engagement of the project with the stakeholder which will include information sharing
13/3/22	FGD	Manjai/Kotu Community	Welcome the proposed project and expressed the hope that it will create employment for the youth. Expressed concern about the expansion to other parts of the country since it may displace businesses and vendors on the right of way. If that happens the affected people should be fully compensated. Stakeholders should be regularly informed about project implementation	On the issue of land acquisition, the consultant explained that this is limited to the land requirements for the landing station and the fiber cable from the shore to the landing station. Expansion in land will use the existing backbone. They were reassured that any land acquired and any business or livelihood affected will be fully compensated to the extent of the loss incurred

15/03/22	FGD	UTG-Faculty of ICT	Expect to see faster and uninterrupted internet services, which will also help improve income of internet services providers. They raised the potential impact on the environment and the people near the project site. Insist the latest technology should be used and qualified people/firms be selected to do the work	The group was informed the award of contracts will be based on the highest international competitive standards. As for the impacts, they were informed that a separate study is being carried out to address this issue as well as any land acquisition issues that will arise.
15/03/22	FDG	UTG Female Students	Welcome the project and buttress the Importance of having in place the right policies and the need to work closely with GSM operators in implementing the project	The consultant assured them that an important component of the project will address the governance environment.
16/3/22	Internet Operator		Has many advantages including reduced internet blackout, enhanced digital communication and increased internet connectivity in the provinces. Concerns include location of the station as land is a sensitive issue. Risk of displacement of people. Need to compensate people for loss of land and consider employment of people living around the project area	On land issues, it was explained that this matter will be addressed in another document currently under preparation but it can be said that all those affected by the project will be fully compensated. For employment, it will be recommended to the project to offer employment to the members of the local community if they have the required skills.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Overall, the purpose of stakeholder identification is to determine groups and individuals likely to be directly or indirectly affected (positively or negatively) or who may have an interest in the project. The issues to be considered in identifying stakeholders include the interests of the stakeholders in the project, participation needs, level of vulnerability, expectations and priorities of the stakeholders. During preparation, a number of stakeholders were consulted and the outcomes and comments arising from those consultations are presented in **Annex 4.**

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.

Cooperation and negotiation with the stakeholders throughout the project development process 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 the 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 getting their views on who can be representing their interests in the most effective way.

3.1 Methodology

To identify the stakeholders, the following activities were undertaken:

1) Meetings with the PIU

2) Review of the relevant literature

3) Consultations with the direct and indirect stakeholders

4) A stakeholder analysis in terms of their influence and interest was also carried out and the findings are presented in **Annex 5**.

The stakeholders of the WARDIP comprise of the following categories, which are further detailed under Section 3.2 below:

- **Affected Parties** –These are stakeholders likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods and may include individuals or groups, including local communities, persons, groups and other entities within the project area of influence 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** – refers to individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector and other civil society organizations.

- **Vulnerable Groups** – persons who may be disproportionately affected or further disadvantaged by the project as compared with any other groups due to their vulnerable status[3,] and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

3.2 Affected Parties

Affected Parties include individuals and groups working in or benefitting from the digital industry, local communities living in GBA whose assets may be directly impacted adversely by the Project. The individuals and groups that could potentially be affected are presented in the table below showing stakeholders affected either adversely or positively.

Table 2: Summary of stakeholders showing their roles and interest in the project and the nature of project impact(positively/negatively) on them

STAKEHOLDER	CURRENT ROLES/OCCUPATION	INTEREST/ROLE IN THE PROJECT
Stakeholders To Be Directly Affected Adversely		
Local Communities living around the coastal area	Occupying state land that may be needed to build the landing station	Area along the coast in the GBA
Women Farmers	Rice farmers/vegetable growers in the coastal whose land may be required for the construction of the landing station or for the fiber cable	Their land may be impacted during the laying of the fiber cable network from the shore to the landing station. The impact may be temporary whilst the project digs and bury the fiber cables
Small business operators along the path of the cables along the coast	Ownership of small stall along cable trajectory including tourist operated facilities along the beach	This may involve temporary loss of earning during the period of digging and laying of the fiber cables
Stakeholders to be directly affected positively		
GSM operators and ISP (GAMCEL, AFICELL, COMIUM, QCELL, NETPAGE ETC.)	Provide telecommunication and internet services to the public	Deployment of secondary submarine cable to strengthen internet service reliability; investment opportunities in the facilities to be built and thus the need for regular consultations with the PIU;
Internet cafe operators	Provide internet services to the public	Access to more reliable service that would boost business and income
Business women	Small scale operators	Acquisition of financial literacy to improve business operations; and on basic and

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[3] 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.

STAKEHOLDER	CURRENT ROLES/OCCUPATION	INTEREST/ROLE IN THE PROJECT
		advanced digital capacities on developing business online and e-commerce
GICT Agency	Responsible for coordination of implementation of IT related projects in the public sector	Support the Operationalization of The Gambia ICT Agency
End-users – Last Mile (Individuals, companies etc.)	These entities rely very much on the internet for their business transactions	Improved and reliable access with less disruptions
Construction engineers/contractors	Execution of civil works	Feasibility studies, design and construction of the landing station and laying the cables
Consultants/experts in various fields	Policy and strategic studies and training	Feasibility studies and prepare strategy documents

3.3 Other interested Parties

The table below provides the different categories of other interested parties for this project.

Table 3: Summary of other interested parties

STAKEHOLDER	RESPONSIBILITY/OBJECTIVE	INTEREST/ROLE IN THE PROJECT
Ministry of communications and Digital Economy	Policy formulation for the sector with oversight responsibility for project implementation	Overall oversight responsibility for the project. Guide and support the PIU in the implementation of E & S instruments.
Project Implementation Unit	Management of the project on a daily basis	Ensure project beneficiaries access project benefits, regular monitoring of performance and support in capacity building and ensure project affected persons (PAPs) are fully compensated for their losses
Ministry of Finance and Economic Affairs	Responsible for managing the public finances of the Government and formulation of economic and financial policies for development	Resource mobilization for the deployment of submarine cable; provision of compensation funds for PAPs; Formulation and Implementation of a cash-lite policy and strategy, Implementation of National Digital Literacy and Skills Development Policy and Strategy
Ministry of Trade, Industry and Employment	Formulation of policy in the development of trade and employment	Implementation of the e-commerce Strategy & Development & deployment of e-commerce Platform
Ministry of Justice	Responsible for judicial matters, the presentation of legal instruments in the National Assembly for ratification	Support to the Data Protection Authority; Represent the Government in disputes involving compulsory land acquisition by the project
Ministry of Transport, Work and Infrastructure	Responsible for overall policy formulation and guidance	Support countrywide rollout of the Digital Addressing System
Central Bank of the Gambia	Manage the financial system to encourage sustainable economic development	Formulation and Implementation of a cash-lite policy and strategy; Provide support to the Data Protection Authority. Enhance the core infrastructure of the

STAKEHOLDER	RESPONSIBILITY/OBJECTIVE	INTEREST/ROLE IN THE PROJECT
		National Payments System (NPS), upgrade of the Real-Time Gross Settlement (RTGS) system.
Consumer Protection Commission	Association to protect the interests of consumers	Provide support to the Implementation of the e-commerce Strategy; Development & deployment of e-commerce Platform; Establishment of consumer protection agency through capacity building, especially in the area of online consumer protection
Information Commission		Support to the Data Protection Authority
Department of Lands and Surveys	Management of the land resources of the country. Advice the government on compulsory land acquisition when the project requires land	Assist Government to identify a suitable land for the land station and the back infrastructural developments in the roll out program
Information Technology Association of The Gambia	Brings together different actors in the sector to promote the development of IT in The Gambia	Support to the Implementation of the e-commerce Strategy & Development & deployment of e-commerce Platform
Gambia Investment & Export Promotion Agency (GIEPA)	Promote investment in The Gambia	Formulation and Implementation of a cash-lite policy and strategy
Gambia Chamber of Commerce and Industry	Promote business interests and advice to its members	Formulation and Implementation of a cash-lite policy and strategy E-Commerce Policy Formulation and Strategy Implementation
Maritime Administration		Deployment of Second submarine cable and potential risks of vessels damaging the cable
Gambia Submarine Cable Company Ltd, etc.	Responsible for managing the ACE project	Deployment of Second submarine cable as a backup to ACE and nature of relationship between the two projects
All Government Ministries, Departments and Agencies, etc.	Implementation of government policies and programs	Capacity building of senior officials on key topics related to cybersecurity and data protection;
Tertiary Education Institutions, Universities, etc.	Provision of education and training beyond the secondary school	Implementation of National Digital Literacy and Skills Development Policy and Strategy and Establishment of Regional Information and Innovation Hub(s)
ICT Agency	Set up to coordinate the IT activities of the government agencies	Formulation and Implementation of a cash-lite policy and strategy
Gambia Radio and Television Services	Provide nationwide coverage of news and entertainment	Broadcast information on project activities to increase awareness. This may include broadcasting press releases and special coverage.
Media Television (Paradise TV, QTV, etc.)	Provision of news and entertainment to the public	Inform public about project activities and any special messages released by the project
Print media	Inform the general public	Prepare and print articles to provide information to the public about the project including special announcements.
Regional Governors	Overall administration of the region and overseeing local administrative structures	Support the sensitizing of the public, facilitate the registration of land transfer

STAKEHOLDER	RESPONSIBILITY/OBJECTIVE	INTEREST/ROLE IN THE PROJECT
		documents and support resolution of project grievances at the regional level
Community radios	Entertainment and news for the public	Convey announcements about the project to the communities within its coverage.
NGOs and Associations established to promote IT and internet development in the Gambia	Promotion of ICT	Provide information on the opportunities and activities of the project to its members

3.4 Disadvantaged and Vulnerable Groups

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. These and other factors can combine to reduce their access to potential project benefits. This category will therefore require specific measures and/or assistance to address their vulnerability to certain risks, including SEA/SH and VAC. Within the Project, the vulnerable or disadvantaged groups will include, but are not limited to, the following:

a) Women rice growers whose fields may be impacted
b) Women vegetable growers in the coastal area
c) Farmers including female farmers growing upland crops whose land may be required for the land station or the fiber cable route
d) Persons living with disabilities and persons suffering from HIV/AIDS and other chronic diseases who are members of households adversely affected by the project.

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 have to adopt a social inclusion approach using communication channels that ensure that vulnerable groups are adequately consulted and engaged in the project.

3.5 Summary of project stakeholder needs

Table 4 below presents a summary of the needs of different groups of stakeholders in terms of language, means of communication and any special needs.

Table 4: Summary of project stakeholder needs

Stakeholder Groups	General Composition	Language requirements	Preferred means of communication (e-mail, phone, radio, letter)	Special needs (Access, meeting times etc.
Government Ministries & Technical Depts.	Comprise advisers/ experts in IT , finance, trade, gender, communication and youth affairs	English	Letters, emails meetings/workshops & video conferencing	Need to have advance notice for meetings and should preferably take place during working days. Documents for discussions should preferably be sent in advance
GSM operators and Internet Service Providers	Telecommunication companies, Internet service providers	English	Letters, emails meetings/workshops & video conferencing	Need to have advance notice for meetings and should preferably take place during working days. Discussion documents should preferably be sent in advance.
Media (see section 4.3)	Several outlets including print and electronic, (radio, newsprint and television)	English Local Languages	Mails, emails meetings & video conferencing	Need to have advance notice for meetings and should preferably take place during working hours
Last mile	Internet café operators, Local government authorities (LGA), Village Dev Committees (VDC), private users including social media platforms	English Local languages	Letters, emails meetings/workshops & video conferencing Radio and social media platforms	Targeting the small operators, LGAs VDCs and private users
Disadvantaged and Vulnerable groups	Comprise business women, persons with disabilities, persons suffering from HIV/AIDS and other chronic diseases	Local languages	Prospectus, fliers, workshops, Communication through radios and television Creation of WhatsApp group	Targeting with special assistance of NGOs Information in local languages through private/community radios
Contractors and service providers	These include firms to carry out the construction works and provide supplies etc.	English and local languages	Letters, emails meetings, announcements through the media	Need to give information wide publicity through media when tenders are placed.

4. STAKEHOLDER ENGAGEMENT PLAN (SEP)

4.1 Purpose and Timing of Stakeholder Engagement Plan

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 the project, enhance project acceptance, and make a 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.

4.2 Proposed strategy for information disclosure

The table below describes how information will be shared and consulted upon with the stakeholders.

Table 5: Strategy for Consultation and information disclosure

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Responsibilities
Project preparation	• Project documents PAD and relevant E&S documents • GM procedures, including SEA/SH, and information on SEA/SH and VAC risk mitigation and response	Letters and emails, also meetings, (in persons and virtual) -Consultation meetings (including video conferencing) -Focus group meetings -Official correspondence -Workshops At initial stage of project identification	Weekly meetings with the WB	Ministry of Communications and Digital Economy • Ministry of Finance & Economic Affairs • Project Management Unit • Major GSM operators • World Bank Staff	The PIU

	• Regular updates on Project Development • Financing Agreement				
	• ESMP requirements including LMP • RPF, • GM Procedure, including for SEA/SH reporting • Project components • Project benefits • Environmental and social risks	Meetings with the communities FGD and Key Informant Interviews Use of media to disclose approved E & S documents Social media e.g., WhatsApp, Facebook	During E & S instruments preparation in the locality or workplace of affected stakeholders	Beneficiary communities Relevant government agencies at national and regional levels including Governors, Chiefs, Community leaders and village development committees' members Vulnerable groups including women	PIU and Consultant
During Project Implementation Mid-term review (social & environmental audit) Mid-term	• ESMP requirements • GM Procedures including for SEA/SH reporting • Information on capacity building programs • Information on sensitization programs • Project land requirements • RAP development outcomes • Compensation and relocation • Findings of the audit report	Public notices Electronic publications and press releases on the M/ Information and project websites Focus group meetings Traditional drama groups Town/village criers Announcement by the mosque Text messages and social media Social media e.g., WhatsApp, Facebook	During implementation of the developed E&S instruments	• Ministry of Communications and Digital Economy • Ministry of Trade and Employment • Ministry of Finance & Economic Affairs • Project Implementation partners (GSM Operators, etc.) • Governors in PIZ • Local Government Authorities • Contractors • Gambia Investment & Export Promotion Agency	PIU, Contractors, and Consultants

				• Central Bank of The Gambia NGOs and civil society organizations	
Decommissioning/Project completion	• Findings of the evaluation of the environmental and social performance of the project • Any outstanding complaints to be resolved	Focus group meetings -Official correspondence -Workshops - meeting with communities	At the end of project but before closure	Ministry of Communications and Digital Economy, Ministry of Finance & Economic Affairs, Ministry of Trade, Central Bank, GIEPA, PURA, GCCCI Beneficiary communities Relevant government agencies at national and regional levels including Women's business groups Governors, Chiefs, Community leaders and VDC members	

4.3 Proposed strategy for consultation

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 person consultation meetings and interviews with small groups (including with personal protective equipment if required)
- Administration of Mid-Term survey questionnaire
- Focus group meetings with limited number of participants
- One-on-one interviews
- Public notices (including in local and national newspapers, radio (such as the regular program with West Coast Radio and Taxi FM), TV, billboards, mosques and churches announcements, local markets, Alkalos, and VDCs)
- Telephonic interview
- Text messages:
- Electronic publications and press releases on the TV, radio
- Ministry of Communications and Digital Economy website outlet: https://www.MOCDE.gov.gm
- Social Media
    https://facebook.com/profile.php?id=100070229588702
  https:twitter.com>MOCDEgambia
    https://www.accessgambia.com

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 services in the IT sector. These will include organizations such as the Information Technology Association of the Gambia (ITAG), Gambia Cyber Security Alliance. These will include arranging special meetings with them at a more convenient place and time (not Fridays, or during time women are at the market or busy with child rearing duties) but using methods and places to ensure youth and persons with disabilities are included. Some of these organizations have already carried out sensitization programs with the youth and schoolchildren on cyber security and data protection awareness. Similarly, women and girls, for instance, should be independently consulted in safe and enabling environments and grouped by age ranges with female facilitators leading the group discussions, especially in the case of sensitive topics such as SEA/SH risk and sex workers. It is also recommended to closely work with NGO specialized in working with vulnerable groups so that the right approach will be taken to incorporate their views including their views on their preferred complaint channels and the effectiveness of SEA/SH mitigation measures and concerns. For the physically challenged persons with visual and hearing impairment, for example this may require providing transportation to the meeting venue and having the information translated into sign language.

4.5 Reporting back to stakeholders

The Ministry of Communication and Digital Economy through the PIU will document all program activities, and the consolidated reports will be made available to the stakeholders and the relevant authorities. The PIU will revise and update the SEP periodically, as necessary during project   implementation, to ensure that the information presented therein is consistent and is the most recent. 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 VDC meetings and workshops; and

ii)   Publication of the reports on the project website, social media, TV, newspapers, PIU office etc.

Key performance indicators will include:

a) Number of VDC/WDC meetings held to discuss the annual report

b) Number of workshops held at national level to discuss the report

c) Number of gender disaggregated participants at these meetings

d) Number of media outlets that published or presented the report

e) Number of social media outlets that carried the report

f) Number of people who read and commended on the report

4.6 Communication Plan

The proposed stakeholder engagement strategy presented above will help increase awareness among the stakeholders, particularly amongst the most vulnerable about the project and its activities and their roles in its implementation. To ensure an effective delivery system, the project will develop a communication plan that takes account of the stakeholders' needs and preferences in terms of information. The plan will identify, on an annual basis, the communication activities to be carried out and the resource requirements to implement these activities. The project will collaborate with NGOs and CSOs in targeting and conveying messages especially among the disadvantaged and vulnerable groups.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources
The environment and social safeguards specialists recruited by the PIU will oversee stakeholder engagement activities and specifically the Social Safeguards specialist will oversee the consultations with vulnerable groups (including with women).

5.2 Management functions and responsibilities for managing the Stakeholder Engagement Plan
Overall responsibility for the project will lie with the Ministry of Communications and Digital Economy, which will host the Project Implementation Unit that will be responsible for the day-to-day management and coordination of project activities. The Ministry is currently in the process of recruiting for the PIU and the positions include the environmental and social Safeguards specialists. The Ministry has no experience with the implementation of World Bank funded projects and lacks experience with environmental and social risk management requirements under the World Bank's Environmental and Social Framework.

Once recruited the different categories of staff will have the following responsibilities:

- **The PIU** will oversee the day-to-day management of the project. This includes: coordinating and overseeing implementation of this SEP and communication activities.
- **The environmental and social team of the PIU**, will be directly responsible for coordinating the implementation of the stakeholder engagement activities, in consultation with other members of the PIU.
- **The communications consultant** will help develop the communication plan and support its implementation and shall liaise closely with the media.
- **The Social Safeguards Specialist** will be responsible for coordinating the implementation of the GM. and will also be responsible for overseeing the implementation of activities relating to the SEA/SH Prevention and Response Action Plan to be developed in the environmental and social management framework (ESMF).
- The media (both print and electronic as well as private or public) in close collaboration with the communication consultant and Monitoring and Evaluation Specialist will carry information about the project to the wider public.

The stakeholder engagement activities will be documented through:

- Monthly/quarterly reports
- Ministry of Communications and Digital Economy's website, (social media including Facebook, YouTube, Instagram and other sites), radio (both national and local) and television
- 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 Grievance Mechanism (GM) is designed with the objective of resolving disputes at the earliest possible time before they escalate, to respond to misconduct or abuse committed by project associated staff and personnel, and for stakeholders to be able to engage the project and ask questions and raise concerns without fear of reprisals. 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.

The GM developed for this project aims to be effective and responsive to address project complaints and concerns at project-level so that grievances are not referred to the court system for resolution, which is often not timely, financially feasible or accessible to all. A functioning, inclusive and accessible grievance mechanism is essential for social sustainability of the project.

The present GM responds to concerns and grievances of PAPs related to the environmental and social performance of the project. However, the grievance mechanism for project workers will be provided separately under the Labor Management Procedures prepared for this project. The grievance mechanism provided below will set out specific procedures to manage SEA/ SH complaints ethically and confidentially accompanied by an appropriate response protocol allowing access to GBV services (at minimum medical, psychosocial, and legal) through referrals.

The Project will make available grievance forms in every affected community (Alkalo or VDC) as an accessible venue for filing a grievance and will discuss with the VDC and Alkalo requirements to consider social distancing measures. A literate member of the VDC or the community will help in completing the forms. They will sign codes of conduct listing the prohibited behaviors and the sanctions for violations (to be developed) to ensure that they will respect the confidentiality of the complaints

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. The GM will not have complex processes that create confusion or anxiety (such as only accepting grievances on official-looking standard forms or through grievance boxes in government offices). Safety and accessibility of contact options/reporting channels will be confirmed during community consultations including with women in separate groups animated by a woman.
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.

The key objectives of the GM are:

● 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, cultural and community 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.

6.2   Structure of the GM

The GM shall consist of a three-tier system: (i) local/community level; (ii) project level grievance resolution; and (iii) national legal level. The general process is that a PAP should first raise a grievance at the local level. If it is not resolved at this level, it is referred to the Grievance Resolution Committee (GRC). If this proves unsuccessful in resolving the grievance, the complainant can proceed to the judicial/legal system.

6.2.1 Local Level Grievance Resolution
Local communities have existing traditional and cultural grievance resolution mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the Project, contractor(s), and or Government representatives at local and national level. The extended family, village and/or chiefs may be involved at this level. All non-sensitive and minor complaints will be addressed at the local level grievance mechanism, which is to be set up three months after project effectiveness. Disputes relating to traditional and customary issues such as land ownership, inheritance, and land boundaries will be referred to the traditional dispute resolution mechanism. The specific composition and other details will be spelt out before project implementation. If the complaint cannot be resolved at this level, the PAP will be advised to proceed to the next level, the Project level-Grievance Resolution Committee. Other complaints such as breaches in community health and safety, resettlement issues, etc. will be managed at this higher level. For cases related to SEA/SH, distinct entry points/contact persons/reporting channels will be selected at local level

and confirmed as safe and confidential during the consultations with women and girls (in small groups led by a woman). All SEA/SH survivors reporting abuse via those channels will be oriented to the GBV service provider[4], if survivors wish to do so and the Social Safeguards Specialist of the project will be informed immediately to manage the complaint.

6.2.2 Project-level Grievance Resolution Committee: The Grievance Resolution Committee 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. It will deal with all grievances that have not been resolved at the local level.

The broad responsibilities of the GRC include:
- Developing and publicizing the grievance management procedures
- Receiving, reviewing, investigating, and keeping track of grievances
- Adjudication of grievances
- Monitoring and evaluating the fulfillment of agreements achieved through the grievance mechanism.

The GRC will normally include a representative from each of the following agencies:

(i)   the Ministry of Communications and Digital Economy;
(ii)   The Project Coordinator, PIU or his representative;
(iii)   an NGO working in the sector;
(iv)   the Area Council;
(v)   A representative of PAPs,
(vi)   Representative of the Ministry of Lands and Regional Government (if the grievance is related to lands/resettlement);
(vii)   A representative from the Ministry of Gender, Children and Social Welfare
(viii)   Social Safeguards Specialist in the PIU serving as the secretary to the Committee.

6.2.3 National legal level: If the GRC does not provide a satisfactory resolution for the PAP, he or she will be advised to seek resolution of grievances through the judicial system as provided for in the Constitution 1997 and other relevant laws. Legal costs borne by the complainant will be his or her responsibility.

6.2.4 Grievance Mechanism Procedures for complaints unrelated to SEA/SH
The community will be informed and sensitized about the existence and use of the GM through radio notices, community meetings, Imams, Priests and with some awareness trainings by the PIU prior to the starting of the resettlement process and of the various uptake options where complaints can be submitted. These uptake channels can include:
- Toll-free telephone hotline;
- E-mail;
- Letter to project focal points in the regions;
- 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.

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[4] The GBV service providers mapping need to be done, and a referral protocol should also be signed between the project and the service providers.
Women should be at least 30 percent of this committee

The following procedures will be followed in treating 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 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 3.** The complainant shall receive an acknowledgment of receipt within 48 hours of filing his/her complaint.

Step 2: Investigation of complaints

A sorting is carried out by the complaint handling bodies to distinguish between sensitive (i.e., SEA/SH/VAC) and non-sensitive complaints, considering the precise criteria retained by the Project Implementation Manual. Non-sensitive complaints will be dealt with by the GRC. Sensitive complaints, after registration by the GM Operator (for SEA/SH/sensitive complaints), are immediately transmitted to the special committee set up to address SEA/SH (**see section 6.2.5 below**). The time required to analyze a non-sensitive complaint shall not exceed seven (7) 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 complaint 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 complainant 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 first instance.

In the event of dissatisfaction, the complainant may contest the measures adopted. The complainant could request a review of the resolutions 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 Committee has ten (10) working days to review its decision and propose additional 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) starts five (05) working days after the

complainant acknowledges receipt of the letter notifying him/her of the solutions adopted and his/her agreement to the decision on the measures proposed.

Step 7: Judicial settlement

If all attempts at an amicable resolution are not acceptable to the complainant, the latter may resort to the judicial system. 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, but complainants are free to opt for a judicial procedure if they wish. Thus, complainants must be informed of their freedom to have recourse to the judicial system. Legal costs or costs related to legal recourse will be borne by the complainant.

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 3**) 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 communities 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 stakeholders 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 be retained in physical hardcopy (**Annex 3).**

Figure 2: Grievance Mechanism procedures for managing complaints unrelated to SEA/SH of WARDIP

6.2.5 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 by ensuring confidentiality and also take action only with survivor's informed consent. The security of the involved parties will not be breached. A mechanism in the form of **SEA/SH Compliance Team** will be set up to manage cases of SEA/SH as well as issues related to violence against children (VAC). The membership of the SEA/SH Compliance Team will include:

a. *A social safeguards specialist (with experience in GBV)*

b. *The occupational health and safety manager from the contractor, or someone else tasked with the responsibility for addressing SEA/SH and VAC with the time and seniority to devote to the position, s/he will also be trained by the social safeguards specialist or GBV consultant;*

c. *A representative from a local service provider with experience in GBV and VAC (the 'Service Provider').*

d. *A representative from the MoCDE that will be trained by the GBV Specialist*

These members will be specially trained on the management and review of SEA/SH complaints, the importance of a survivor-centered approach, as well as guiding principles for survivor care and management of SEA/SH data and claims. If permitted by the survivor, a representative from a service provider should participate in the management committee to provide advocacy on behalf of the survivor and ensure that survivor care principles are respected throughout the process. Below are the procedures for managing the grievance mechanism for SEA/SH–related incidents.

6.3. Procedures for the Management of SEA/SH-Related Complaints

Step 1: Uptake

A complainant who wishes to lodge an SEA/SH-related grievance may use any trusted channel made available by the project to file a complaint with the project GM. The project should identify secure, confidential, and accessible entry points through which survivors will feel safe and comfortable making reports (e.g., an anonymous complaint box, grievance form, telephone, service provider, community-based structure, or focal point, etc.). Complainants may also use contractor grievance processes to file SEA/SH claims, but once filed with the contractor, the claims should be referred for verification to the SEA/SH GM operator for the project who will be specifically tasked to handle sensitive complaints such as SEA/SH.

The appropriate actor should complete a complaint intake form after having obtained the survivor's written consent to proceed with the grievance. If the complainant has not yet been referred for services, the intake actor should confirm whether the survivor wishes to receive support, and if so, obtain the survivor's consent to be referred for appropriate care and connect the survivor with locally available providers or arrange for remote support where needed. Medical, psychosocial, and legal aid services should, at least be made available, other services as well if possible (for example, socio-economic, security and legal).

Where community-based uptake points are utilized, these actors must be trained on how to receive and refer SEA/SH cases in accordance with survivor care principles, how to apply active listening techniques, and how to complete and store intake forms safely and confidentially[5.]

If the survivor chooses to be referred for services only and not to file a complaint, then the survivor's wishes must be respected; the service provider can then ask if the survivor consents to share basic case information in order to assist the project to track the cases that choose not to access the GM. The survivor always retains the right to be referred for services whether there is a link established between the project and the incident in question.

Any information collected about a survivor, or the alleged perpetrator recorded should not go beyond the nature of the incident, the age and sex of the survivor, whether to the survivor's knowledge the perpetrator is linked to the project, whether the survivor has been referred to care services. The forms will be kept separately from other grievance documentation, in a secure and lockable space, with strictly limited access.

Step 2: Sort and process

Once the complaint has been formally received by the dedicated GM operator for processing sensitive complaints (position to be determined pending the PIU being set up), with informed survivor consent, the GM focal point (for the SEA/SH GM) should verify that the complainant has been offered the opportunity to receive services, and if not, ensure that the survivor is referred for necessary services upon obtaining the survivor's informed consent.

The complaint should then be treated as a SEA/SH complaint and the coordinator for the verification structure notified that a SEA/SH complaint has been received and will need review. The GM focal point should also notify the appropriate PIU focal point (the GBV specialist), who in turn will inform the World Bank project Task Team Leader, within a 24-hour period that a SEA/SH complaint has been received. The GM focal point need only share the nature of the case, the age and sex of the complainant (if known), whether there is a link with the project (if known), and whether the survivor has been referred for services. Absolutely no identifying information for the survivor or the alleged perpetrator may be shared with either the PIU or World Bank focal points.

Step 3: Acknowledge receipt

The GM focal point should ensure that the complainant receives a document acknowledging formal receipt of the SEA/SH grievance within three days of the complaint being filed. Delivery of the acknowledgement to the complainant will depend upon how the complaint was initially received; if, ideally through a service provider, then all communication with the survivor can be done through the service provider.

Step 4: Verification process

The verification process for a SEA/SH grievance will be handled by the SEA/SH Compliance Team (**SSCT**) as described above. Once convened by the SSCT coordinator, the SSCTSEA/SH Compliance Team will review available information about the SEA/SH claim in question, the nature of the claim, and whether there is a link with the project. The SSCT will also make its recommendations to the alleged perpetrator's employer or manager as to appropriate disciplinary sanctions per the code of conduct, type of incident, and the appropriate labor laws and regulations. Potential disciplinary sanctions for alleged perpetrators can include, but are not

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[5] It is recommended that the intake forms etc. are stored in a lockable space with limited access by GBV service providers or *SEA/SH Compliance Team* level to reduce the risks of breach of confidentiality and security.

limited to, informal or formal warnings, loss of salary, and suspension or termination of employment. The SSCT must complete the verification process and render its decision within 10 days of receipt of the complaint.

It should be noted that the objective of the verification process is to examine only whether there is a link between the project and the reported SEA/SH incident and to assure accountability in recommending appropriate disciplinary measures. The verification process establishes neither the innocence nor the guilt of the alleged perpetrator as only the judicial system has that capacity and responsibility. In addition, all final decisions regarding disciplinary actions will rest solely with the employer or manager of the alleged perpetrator; the SSCT can make only its recommendations.

Step 5: Monitor and evaluate

Monitoring of the SEA/SH complaints will be important to ensure that all complainants are offered appropriate service referrals, that informed consent is obtained in all cases for both filing of grievances and service referrals, and that all grievances are handled safely and confidentially, and in a timely manner. Any information shared by the GM operator with the PIU or World Bank will be limited as noted above under Step 2. The project GM operator should establish information-sharing protocols with service providers in order to ensure safe and confidential sharing of case data as well as appropriate closures of SEA/SH cases.

Step 6: Feedback to involved parties

Once the verification process has been concluded, the result of the process shall be communicated first to the survivor within fourteen days, ideally through the service provider, to allow the survivor and relevant advocates the appropriate amount of time to ensure adequate safety planning as needed. Once the survivor has been informed, the alleged perpetrator can be informed of the result as well.

If either party disagrees with the result, s/he can appeal the SSCT decision via the GM appeals process and must file an appeal within fourteen days of receipt of the verification result. This appeal will be filed to the Permanent Secretary, who will set up a committee composing of Project Coordinator PIU.

Figure 3: Grievance Mechanism procedures for managing complaints related to SEA/SH of WARDIP

7. MONITORING AND REPORTING

7.1 Monitoring of the implementation of the SEP

The Social and GBV Specialist in collaboration with the Environmental specialist, communication and 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 parameters:

● Number of consultation meetings and other public discussions done in line with what is outlined in this SEP
● Number of community sensitization and training on GM handling activities
● Number of community sensitization and project worker meetings on Codes of Conduct and SEA/SH- GM processes

- 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, regional, and national and social media channels
- Number of training program on GM management for project affected stakeholders
- Number of grievances from staff and communities
- Number of grievances received from persons or vulnerable groups
- Number of grievances resolved within the prescribed timeline
- Percentage of complaints received regarding SEA/SH that had been referred to GBV services for medical, psychosocial and/or legal assistance.

The report of the monitoring will be in the activity report, to be prepared every six months, highlighting the mobilization actions put in place specifically, the problems encountered, and the solutions provided to resolve them. These reports will be shared with other stakeholders, including the World Bank.

7.2 Involvement of stakeholders in monitoring activities

Every two weeks, Community Liaison Officers of the project will collect forms filled out to submit them to the GRC. The E&S team will also call VDC's and the Alkalo of affected communities every month and visit the Information Department's offices to check if any grievances or concerns have been brought to them. Regular consultations will be held with women and girls in order to establish and then to help monitor the effectiveness of the GM procedures, including those specifically designed to address SEA/SH risks, and whether the GM is in fact accessible, safe, and adequate to address the needs and risks of these stakeholders. These consultations should not seek out or discuss personal experiences of violence or abuse of individual survivors but ask for overall feedback from women and girls.

8. BUDGET

To ensure full implementation of the activities envisaged in this plan, the budget below has been prepared with an indicative cost of the activities which comes to about USD 60,000.00 (Sixty Thousand US Dollars) equal to D3,000,000 (Three Million 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 IDA	150,000	3,000
Consultation and meetings with stakeholders	PIU	Throughout implementation	200,000	4,000
Radio & TV programs	PIU		1,500,000	30,000
Management of complaints not related to SEA/SH and VAC - Sensitization and training of management committees and office supplies	PIU	Before the start of works	150,000	3,000
Management system of GM (operations, collecting and processing of grievances and maintaining database)	PIU & committees	During implementation	100,000	2,000

SEA/SH Prevention and Response Action Plan - Training and awareness; Case management and support for psycho-social victims	PIU , SS Specialist		400,000	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	500,000	10,000
Total			**3,000,000**	**60,000**

Exchange rate: 1USD= GMD 50.00

9. CONCLUSION

This Stakeholder Engagement Plan was developed through a participatory approach and it 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 the stages of project implementation through meetings, information sharing through media etc., interviews with the various actors and organisations concerned, public meetings, workshops or 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.

10. ANNEXES

Annex 1: Sample Form for recording consultations with stakeholders

Date of Consultations		
Venue of the meeting		
Topic of consultations		
Stakeholders Present	Name and Function	Organization/Community
	1.	
	2.	
	3.	
	4.	
	5.	
	6.	
	7.	
	8.	
	9.	
	10.	
Discussion points		
Recommendations		

Annex 2: Sample of a Feedback form

Address of the PCU	Date of Consultation	Venue of Consultation
Name and Status of Stakeholder	Address: Telephone:	Email:

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?	

Annex 3: Grievance logbook

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 the 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											

Annex 4: Summary of consultations with stakeholders during project preparation

Date	Participants	Topics Discussed	Conclusions/Recommendations
March 4, 2022	MOCDE ,NaNA Project preparation Unit & Consultant	Review of the TOR for the study to confirm common understanding, preliminary identification of stakeholders, and discussion of logistics arrangements and documentation requirements. Land requirements for the project. Institutional capacity for risk management.	It was not clear whether the current landing station would be used. Low capacity but the recruitment process for the environment and social specialists have started
March 7,2022	Senior Management	Role of GAMTEL as the manager of ICT infrastructure. Current backup using Senegal are limited and expensive with security implications-thus the need for a second national backup for ACE. This will minimize interruptions and costly diversions through Senegal Importance of regular consultations with MoCDE and other stakeholders during project preparation and implementation on a monthly basis.	The consultant confirmed that the essence of the present exercise is to explore a responsive communication plan for a more effective stakeholder participation. Depending on the stage of development, regular consultations through a structured framework will be carried out.
7/3/22	Director ICT-Public Utilities Regulatory Authority	Role of the agency in the ICT sector and the challenges currently faced which include coordination of key institutional actors and the absence of important regulatory frameworks to guide the development of the sector, which the project should address. The Director also emphasized the need for active private sector participation.	It is important for the project to ensure close consultations with the stakeholders, particularly the major service providers and potential investors.
9/3/22	AFRICELL-CEO & Technical Director and the Consultant	Welcome the project particularly the PPP approach. Increased bandwidth should facilitate expansion and increased access to the internet. At the same time, efforts should be made to strengthen the local backbone (ECOWAN) to carry the increased traffic. There is a need for more regular communication between the policy makers and the private sector and a regular reporting system should be in place during implementation of this project at least on a quarterly basis. Also ensure competent companies are hired to do the work	
9/3/22	QCELL And the consultants	Welcome the project particularly the PPP approach. Current cable is degrading, resulting in inconsistent interconnectivity. Increased bandwidth should facilitate expansion and increased access to the internet. The project should be implemented and managed by people who have the required qualification and experience.	

13/3/22	Latrikunda	Welcome the project but expressed concern that running the cables underground may affect the water pipes during construction and small businesses along the path of the cables may have to stop during the period of construction	The community was reassured that any temporary economic displacement will be compensated because of the resulting loss of earnings
13/3/22	Manjai/Kotu Community	Welcome the proposed project and expressed the hope that it will create employment for the youth. Expressed concern about the expansion to other parts of the country since it may displace businesses and vendors on the right of way. If that happens the affected people should be fully compensated. Stakeholders should be regularly informed about project implementation	On the issue of land acquisition, the consultant explained that this is limited to the land requirements for the landing station and the fire cable from the shore to the landing station. Expansion in land will use the existing backbone. They were reassured that any land acquired and any business or livelihood affected will be fully compensated to the extent of the loss incurred
14/3/22	Bundung Borehole	Concern over people losing their land including farmland without adequate compensation. Recommend that all land loss should be fully compensated. Also appeal for the project consider the local youth for employment	The consultant reassured them that any land taken will be fully compensated. On employment, he informed the meeting that the contractor will be advised to give employment opportunities for the youth if they have the required skills
15/03/22	UTG-Faculty of ICT	Welcome the project. Expect to see faster and uninterrupted internet services, which will also help improve income of internet services providers. They raised the potential impact on the environment and the people near the project site. Insist the latest technology should be used and qualified people/firms be selected to do the work	The group was informed the award of contracts will be based on the highest international competitive standards. As for the impacts, they were informed that a separate study is being carried out to address this issue as well as any land acquisition issues that will arise.
15/03/22	UTG Female Students (Women only)	Welcome project Importance of having in place the right policies Appealed that women should not be forgotten in accessing project benefits. On land issues the students emphasized payment of compensation. On SEA/SH they said this is a reality in our society which needs to be addressed seriously. It will be important for the project to take on this challenge seriously	The consultant assured them that an important component of the project will address the governance environment and business women will receive special consideration. On land the consultant reassured them that for any land acquired the owner will be fully compensated. On SEA/SH, the consultant informed them that the project will put in place a plan to address this particular risk.
15/3/22	Tallinding VDC	Welcome the project as it will help reduce the high cost of the internet. Running the cable underground may affect small businesses' operation along the path.	The community was reassured that any such losses will be fully compensated.
16/3/22	Community of New Jeshwang	Welcome the project and expressed concern about land compensation which they feel is never enough to buy another piece of land in Kombos Youth employment should also be	The consultant explained that the compensation will be at replacement cost which will include not only current price of the land but also the other related costs so that the PAP does not lose at the end.

		considered especially for communities where the project is to be implemented.	
16/3/22	Women Councilor and group from Tallinding (women only group)	Welcome the project but want to know more about how it can help women as they are lagging behind in everything. Projects like this should give them special consideration and see how their business can be supported through credit and other means. Consider SEA/SH exists and women are the greatest victims	Consultant explained that the project will provide special support to women such as training in IT to help their business. For SES/SH, the project will put in place a special plan to prevent or reduce its occurrence within the project.
16/3/22	Abuko community	Has many advantages including reduced internet blackout, enhanced digital communication and increased internet connectivity in the provinces. Concerns include location of the station as land is a sensitive issue. Risk of displacement of people. Need to compensate people for their losses. Also raised the issue of youth employment.	The consultant explained that all those whose land is affected will be fully compensated by the Government. On employment, it will be recommended to the project for the contractor to consider the members of the local community for employment if they have the required skills.
16/3/22	Director of Lands	Explained that land from Banjul to Mandinari in Kombo North belongs to the state so it can be allocated to projects. Where private land is concern the Government pays compensation	

Annex 5: Stakeholder analysis in terms of influence and interest

WARDIP 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	

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 and this has been classified into three (3) categories: Strong, Moderate and Low.

Color code legend:

Strong		Moderate		Low	

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 Communication	High	Strong	Maintain a high level of dialogue and involvement at all stages of project implementation
4	Ministry of Finance & Economic Affairs	High	Moderate	Strengthen involvement through information and regular consultation and establish a functional feedback mechanism
5	Ministry of Justice	Medium	Strong	Strengthen involvement through information and regular consultation and establish a functional feedback mechanism
6	PURA	High	Strong	Maintain a high level of dialogue and involvement at all stages of project implementation

7	Telecommunication Cos. and private Internet Service providers	High	Strong	Strengthen participation through information sharing and regular consultations through a functional feedback mechanism
8	Internet Cafes	Low	Strong	Strengthen information, consultation to raise awareness through an awareness mechanisms
9	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	Local Govt. Authorities Ward & Village Dev. Committee	Low	Moderate	Strengthen information, consultation to raise awareness through an awareness mechanisms
11	Decentralized administrative structures	Low	Moderate	Strengthen involvement through information and regular consultation and establish a functional feedback mechanism
12	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 WARDIP's decision-making bodies and are not always informed of the activities of the WARDIP 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.