

**Republic of Zambia**



**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**Girls' Education and Women's  
Empowerment and Livelihoods for Human  
Capital Project  
(P181391)**

**Government of the Republic of Zambia**

**Ministry of Community Development and Social Services, Ministry of Education, Ministry of Health,  
and Gender Division**

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### Acronyms

8NDP	Eighth National Development Plan
AWPB	Annual Work Plans and Budget
CBVs	Community based Volunteers
CDA	Community Development Assistants
COVID-19	Coronavirus Disease of 2019
CP	Cooperating Partner
CWAC	Community Welfare Assistance Committee
DEBS	District Education Boards Secretary
DPO	District Planning Officer
DDCC	District Development Coordinating Committees
DSWO	District Social Welfare Officers
DSW	Department of Social Welfare
E&S	Environmental and Social
ECT	Emergency Cash Transfer
FCDO	United Kingdom Foreign, Commonwealth and Development Office
FGDs	Focus Group Discussions
FM	Financial Management

FSP	Food Security Pack
GBV	Gender Based Violence
G & C	Guidance and Counseling
GD	Gender Division
GEWEL	Girls' Education and Women's Livelihood Project
GRM	Grievance Redress Mechanism

GRZ	Government of the Republic of Zambia
HQ	Headquarters
IA	Implementing Agency
IDA	International Development Association
ILO	International Labour Organisation
ISSB	Institutional Strengthening and Systems Building
KGS	Keeping Girls in School
M&E	Monitoring and Evaluation
MCDSS	Ministry of Community Development and Social Services
MDTF	Multi-Donor Trust Fund
MP	Member of Parliament
MOE	Ministry of Education
MOH	Ministry of Health
MOFNP	Ministry of Finance and National Planning
MOE	Ministry of Education

NGO	Non-Government Organization
OHS	Occupational Health and Safety
PA	Public Address System
PAD	Project Appraisal Document
PAI	Project Area of Influence
PAP	Project Affected Persons/Parties
PDCC	Provincial DEvelopment Coordinating Committee
PSWO	Provincial Social Welfare Officer
PDO	Project Development Objective
PDU	Presidential Delivery Unit
PEO	Provincial Education Office
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PPM	Pay Point Manager
PSP	Payment Service Provider
RF	Results Framework
SCT	Social Cash Transfer
SWL	Supporting Women's Livelihoods
SEA/ SH	Sexual Exploitation and Abuse/ Sexual Harassment
SMS	Short Message Service
SEP	Stakeholder Engagement Plan
SRH	Sexual and Reproductive Health

SWL	Supporting Women's Livelihood
UN	United Nations
UNICEF	United Nations Children's Fund
WB	World Bank
WHO	World Health Organization
ZANIS	Zambia National Information Services

## 1. Project Description

The Girls' Education and Women's Empowerment and Livelihoods for Human Capital Project (GEWEL 2) (P181391) aims *support the Government of Republic of Zambia to improve human capital development and productivity among girls and women and strengthen adaptive social protection delivery systems* through investments to ensure continued uninterrupted delivery of the social assistance program as a foundation for the cash 'plus' approach, with complementary activities layered on for leveraged impacts on human capital growth, including on nutrition for pregnant women, children, and mothers; education at the secondary school level by adolescent girls; and economic inclusion of adult women with climate adaptation and shock resilience in mind, all the while strengthening adaptive social protection delivery systems for effective and accountable delivery of services. GEWEL 2 will build on the results achieved and lessons learned from the design and implementation experience of the first phase of GEWEL to promote greater productivity and human capital growth using a life-cycles approach, with a focus on girls' and women's empowerment. It will serve as an anchor for a more comprehensive multi sectoral human capital program in the future by providing a foundation with national scope upon which additional activities can be layered. The project will cover all the 116 districts in all the 10 provinces of the country and comprises the following components:

**Component 1: Foundational Social Cash Transfer and Nutrition (SCT):** This component will support the continued predictable and reliable delivery of the cash transfers to the SCT caseload, with gradual full takeover by the Government of Republic of Zambia (GRZ), as the foundational social assistance program for a cash 'plus' approach, with complementary activities on nutrition added on for improved nutrition outcomes in the first 1,000 days of a child's life. Taking a holistic approach, the nutrition-sensitive activities will aim to increase the purchasing power of SCT HHs with pregnant and lactating women and/or children under the age of two years through nutrition cash top ups to enable them to invest in their nutrition, while also supporting nutrition-specific activities to enhance demand creation through better understanding of good nutrition practices to promote positive behaviors and uptake of nutrition services, as well as to support improved nutrition service provision at the primary health care facility levels. Nutrition activities will be implemented in a targeted manner in select districts (1-2) to promote learning and serve as a catalyst for future scale up. This component will be jointly implemented by the Ministry of Community Development and Social Services (MCDSS) and Ministry of Health (MOH).

**Component 2: Keeping Girls in School and Beyond (KGS):** Looking at adolescent years, this component will scale up KGS nationally through the provision of financial assistance to eligible adolescent girls from SCT households for associated education costs. Efforts will also be given to support graduating KGS girls to access employment and livelihood opportunities through enhanced transition from secondary school to work or to tertiary education. This component will be implemented by the Ministry of Education (MOE).

**Component 3: Supporting Women's Livelihoods for Climate Smart Productive Inclusion (SWL):** With the goal towards improving productivity and economic welfare in adulthood, this component will scale up SWL nationally, expanding to urban areas also in response to rising urban poverty in Zambia. Poor women from SCT households will be given productivity grants as seed capital, with options for additional sources of financing explored, coupled with enhanced life and business and digital literacy skills training and mentorship, as well as facilitated formation into savings groups. Particular attention will be given to enhancing resilience to climate-induced shocks, while supporting them to adapt more climate-adaptive entrepreneurial activities. In a step and ladder approach to graduation out of poverty, once the full SWL package is delivered, eligible beneficiaries will be linked to the government's Food Security



Pack (FSP) program for more in-depth and longer-term support aimed at improved welfare, including but not limited to farming input, weather indexed insurance, and specialized trainings. Recognizing that FSP does not include explicit linkages to value chains and access to markets, close engagement with the Ministry of Small and Medium Enterprise Development will also be sought to support select SWL beneficiaries progressing through FSP to access market value chains in an effort to sustainably expand their businesses. This component will be jointly implemented by MCDSS.

**Component 4: Institutional Strengthening and Systems Building for Cash ‘Plus’ Delivery (ISSB).** Efforts will continue to be given to strengthen adaptive social protection systems and institutional capacities for effective, accountable, and transparent delivery of assistance, with focus on two broad areas: (i) girls’ and women’s empowerment and (ii) digital solutions. Specifically, attention will be given to addressing negative social norms that give rise to unequal gender practices and GBV, and strengthening the functionality of the GEWEL grievance redress mechanism (GRM) to effectively respond to complaints, and strengthen citizen engagement and beneficiary outreach, including promoting girls’ and women’s voice and agency. Efforts will also be given to operationalizing digital solutions such as establishment of a Social Registry to support effective and accountable delivery of SP services, with response to shocks in mind. Lastly, support will be provided on overall SP sectoral coordination, as well as on cross cutting issues of project governance and internal coordination, monitoring and evaluation, strategic communication and visibility, and fiduciary capacity building. This component will be jointly implemented by MCDSS and Gender Division.

The GEWEL 2 project is being prepared under the World Bank’s Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

**2. Objective/Description of SEP**

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

As agreed between the World Bank and the GRZ, this SEP can be revised from time to time during the implementation of the project to reflect adaptive management, respond to implementation changes, adapt to unforeseen circumstances, and respond to the assessment of activities implementation’s performance. In such circumstances, the GRZ through the Gender Division will agree with the Bank on the changes to be made and will update the SEP to reflect such changes. Agreement on changes to the SEP will be documented through the exchange of letters signed between the Bank and the Government. The Government will promptly disclose the updated SEP.

**3. Stakeholder identification and analysis**

**3.1 Methodology**

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.

- **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

### 3.2 Affected parties

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

Community members in project areas

1. Households where the beneficiaries are derived from
2. Non SCT households
3. Non SWL Beneficiaries (Females)
4. Non SWL beneficiaries (Male)
5. Spouses to SWL beneficiaries
6. Community Based volunteers (CBVs)
7. Boys in KGS Schools
8. Girls in KGS Schools not on KGS
9. Girls at risk of dropping out of schools
10. Parents to KGS beneficiaries
11. Parents to non-KGS beneficiaries
12. School Administration
13. Guidance and Counseling teachers
14. Traditional Leaders
15. Civic Leaders
16. Health Workers
17. Public Health Workers
18. Community Health Workers
19. Survivors of GBV

### 3.3 Other Interested Parties

Other interested Parties (OIP) refer to Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. These will include the following:

1. Traditional media
2. Participants of social media

3. Parliamentarians
4. Other national & International NGOs
5. Donors and Cooperating Partners
6. Academia
7. Private Sector
8. Religious groups and their leaders
9. The public at large
10. Local NGOs working on Women and girl's empowerment at community or district level

### 3.4 Disadvantaged/vulnerable individuals or groups

Within the Project, vulnerable or disadvantaged groups are persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. The SEP seeks to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be adapted to consider such groups or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure their full understanding on activities and benefits of the project. These individuals or groups may include the following in Table 1 below:

*Table 1 Disadvantaged or vulnerable groups*

Stakeholder	Description
Female headed beneficiaries	May experience GBV or SEA/H at home or on transit to collect their payments or during training or meetings
Girls on KGS	May experience GBV or SEA/H at school
Disabled/Persons with chronic illness	May have accessibility challenges
The elderly	May have accessibility challenges

## 4. Stakeholder Engagement Program

### 4.1 Summary of stakeholder engagement done during project preparation

During project preparation, the following public consultation meetings were conducted. Stakeholders Engagement consultations took place in selected Provinces from June to December 2023. The main aim of the consultations was to consult stakeholders on proposed design principles and approaches for GEWEL 2 and receive feedback, accordingly. About 155 people were consulted at province, district and community level. 44 people were from Eastern Province and 111 were officers from Copperbelt Province (Mpongwe and Masaiti Districts). 23 males, 21 females were consulted in Eastern Province, while 65 females 46 males were from Copperbelt Province as per annexes 1 and 3. The main key feedback received included both positive and negative impacts of the project. The consultations revealed that there is need to strengthen coordination between GD, MCDSS, MOE and MOH. This also entails clear role specification for enhanced collaboration. The stakeholders also suggested that an increase in transfer value especially for the girls is cardinal. Additionally, payments of the education grant should be done before the beginning of every school term to ensure every girl has the necessary school requisites when schools commence as indicated in Table 2.

The Key stakeholders included those individuals, communities, groups and organizations that will be affected or have an interest in project activities.

**Table 2 Summary of Consultations**

<b>Stakeholder (Group or Individual)</b>	<b>Summary of Feedback</b>	<b>Response of Project Implementation Team</b>	<b>Follow-up Action(s)/Next Steps</b>	<b>Timetable/ Date to Complete Follow-up Action(s)</b>
Office of the Vice President	The Vice President reiterated the need to continue the implementation of the GEWEL Project, this was part of the preparations for the Human Capital Summit	The Project Implementation Team proceed to take into consideration the recommendations from the VP to extend the project	Project design and initiation and ensure some of the Human Capital issues raised are part of the project design	Completed by June 2024
Project Steering Committee chaired by Secretary to Cabinet	The project is an important vehicle in achieving Government aspirations	PIU proceeded to action the recommendation by the Steering Committee	Steering Committee to continue overseeing the project initiation and implementation	Quarterly
Ministry of Finance (Minister of Finance and National Planning and the Secretary to Treasury	Ministry of Finance agreed to secure financing for GEWEL 2.0	Facilitated both the engagement and the action to design the project following MOFNP agreeing to secure financing	Formalize financing with the World Bank	June 2024
Minister of Health, Minister of Community Development and Social Services and the Minister of Education	Ministers agreed with the need to continue project implementation and increase geographical coverage	The Project implementation team took note of the Ministers recommendation	Continue appraising the Ministers on progress towards project extension	Monthly updates
Presidential Delivery Unit	The Project team introduced both GEWEL and GEWEL 2.0 to the PDU and design was well received		Field visit with PDU to familiarize them with the Project	January 2024
Members of Parliament (MPs)	The MPs agreed to support the extension and	The project team noted the recommendations	Field visit with MPs to selected districts	December 2023

<b>Stakeholder (Group or Individual)</b>	<b>Summary of Feedback</b>	<b>Response of Project Implementation Team</b>	<b>Follow-up Action(s)/Next Steps</b>	<b>Timetable/ Date to Complete Follow-up Action(s)</b>
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	implementation of the project	of the MPs and planned for field visits to selected districts to help them familiarize with the project	to familiarize them with the project	
Permanent Secretaries (MCDSS, MOE, MOH, Gender Division)	The Permanent Secretaries as controlling officers agreed to the continued implementation of the GEWEL Project with amended design as proposed.	The Project team initiated the discussion with the World Bank and Ministry of Finance respectively	Complete design of GEWEL 2	Quarterly
Government Line Ministries				
Provincial Development Coordinating Committee (PDCC)	Members of the PDCC from selected Provinces were consulted and agreed with the project design. Details are attached in Annexes 2 and 3 as minutes of the meeting	The team took note of all suggestions made during the stakeholder consultation meetings	Continued stakeholder consultations during project life cycle especially during inception meetings	June 2024
District Development Coordinating Committee (DDCCs)	DDCCs from selected districts were consulted on the design of GEWEL 2 and broadly agreed with the design. They made submissions which are recorded as meeting minutes in the Annexes 2 and 3	The team undertook to ensure some of the submissions are taken into consideration during design and initiation	Continue with consultations and engagements during project life cycle	Annually
Community Welfare Assistance Committee (CWACs)	The CWACs communities were engaged over the design of GEWEL 2. Agreed but made submissions on expectations as recorded in meeting minutes Annexes 2 and 3.	The submissions were noted and will be considered during finalization of design	Consultations and engagements to continue throughout project life cycle	
Parents Teachers Association	The parents and Teachers associations were engaged during different symposiums and their submissions are in the report attached	The submissions were noted and will be considered during finalization of design	Consultations and engagements to continue throughout project life cycle	Annually

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable/ Date to Complete Follow-up Action(s)
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School Administration	School Administrators were engaged during different M&E visits	The submissions were noted and will be considered during finalization of design	Consultations and engagements to continue throughout project life cycle	Annually
Girls	<p>Girls were met during different M&amp;E visits to the schools and the report is attached to the annex the girls gave the following key feedback;</p> <ol style="list-style-type: none"> <li>1. That they are grateful for KGS because it has allowed them to be in school and also return to school after having been pregnant.</li> <li>2. The girls requested for boarding facilities because they cover long distances to get to school.</li> <li>3. That the Education grant allocation was not adequate to cover for all the school requisite, they required hence they proposed to have a termly allocation for the education grant instead of once per year</li> <li>4. Girls in upper primary (grade 5 to 7) requested to be on the programme especially those that had fallen pregnant and subsequently dropped out of school..</li> </ol>	The submissions were noted and will be considered during finalization of design	Consultations and engagements to continue throughout project life cycle	Annually
Boys	<p>Boys were met during different M&amp;E visits to the schools and the report is attached to the annex</p> <p>The boys requested to be included on the KGS programme.</p>	The submissions were noted and will be considered during finalization of design	Consultations and engagements to continue throughout project life cycle	Annually

#### 4.2 Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed and cover different stakeholder needs as stated in table 3 below:

*Table 3 Engagement needs and methods*

Stakeholder group	Needs	Language needs	Preferred Method, tools and techniques
Steering Committee Members	Project Progress and progress towards achieving objectives	English	Formal meetings, memo and letters, reports
Members of Parliament	Project Design, geographical scope and entitlement of community members	English	Formal Meetings, Meetings, Workshops, Letters
Office of the Vice President,	Project design, Project implementation and status	English	Emails, Meetings, phone calls, Project Document, Project report
Cabinet	Project design and Project Status	English	Cab Memo
Beneficiaries	Project implementation, beneficiary selection, GBV risks and entitlements,	Local language	Community meetings, Focus group discussions and various IEC materials
Community members	Project design, beneficiary selection and entitlements	Appropriate local language	Public meetings, Community Consultations, Focus Group Discussion

### 4.3 Stakeholder engagement plan

The projects stakeholder engagement plan is presented in the table 4 below:

*Table 4 Stakeholder Engagement plan*

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Project Design and Preparation Phase	<i>Prior to Appraisal, approval and implementation</i>	Project design and scope, soliciting input into design	Formal meetings and Workshops, community meetings	PIUs, Provincial and District staff and Communities, CPs	Gender Division, MCDSS, MOE, MOH and the World Bank
Project Implementation Phase	<i>During Implementation</i>	Project towards achieving PDO, issues affecting PAPs, Grievances,	Workshops, meetings, trainings, IEC materials	PIUs, Stakeholders, Donors and PAPs	Gender Division, MCDSS, MOE, MOH and the World Bank

Monitoring and Control Phase	<i>Project Inception to Closure</i>	Monitoring inputs and outputs towards achieving PDOs	Field Visits, focus group discussions	PIUs, CPs and World Bank	Gender Division, MCDSS, MOE, MOH and the World Bank
Project Closure Phase		Engage stakeholders on project closure	Meetings and workshops	PIU, World Bank	Gender Division, MCDSS, MOE, MOH and the World Bank

#### 4.4 Reporting back to stakeholders

The stakeholder engagement process will aim to support the development of strong, constructive, and responsive relationships among the key stakeholders for successful management of the project's E&S risks. Effective stakeholder engagement between GRZ and project stakeholders improves the environment and social sustainability of projects, enhances project acceptance, and makes significant contribution to successful project design and preparation.

All stakeholder engagement meetings will have minutes, which will be stored in the project stakeholder engagement database; this will be to ensure that (i) there are records that can be referred to and that all views raised are taken into consideration, and (ii) commitments made are delivered upon.

Advice on basic requirements for meaningful monitoring is plentiful. Like any other type of monitoring, monitoring of engagement needs to comply with basic requirements such as goals and objectives need to be established, targets and trajectories need to be set, financial contributions need to be committed, and personnel need to be trained and made responsible for their duties. It is also important to remember that monitoring is a process. Therefore, monitoring can and should occur at different time steps. For example:

- **Monitoring of the engagement process itself:** this type of monitoring can be initiated over the short term. The effectiveness of the engagement process can be monitored, and the process can be adjusted for improvement.
- **Monitoring of outputs:** this type of monitoring can be initiated at the end of the engagement process itself, as a tool for evaluation of the completed process.
- **Monitoring of outcomes of the engagement process:** monitoring of outcomes requires longer timelines as well as evaluation of a wider set of drivers and conditions. Longer timelines and increased complexity also mean increased funding requirements. However, this type of monitoring does allow us to track the actual effectiveness of the engagement process as an agent of change.
- **Monitoring of trends ('reach'):** this type of monitoring is even more complex in nature. It also requires long timelines but places greater emphasis on evaluation of wider sets of drivers and conditions and their impact on resource conditions.
- **Monitoring of unintended consequences:** the monitoring system needs to be sufficiently flexible as to allow for and accommodate changes in context. The learning will be greatly enhanced if the system allows for monitoring of unintended consequences, as well as the expected ones.

The monitoring system should follow generic standards (that evaluation serves the information needs of users), feasibility (evaluation should be realistic and prudent) and accuracy (evaluation will reveal and convey technically adequate information about the features that determine worth, or merit of the program(s) being evaluated).

For this project, quarter and annual E&S performance reporting is expected for WB; it includes the performance of stakeholder engagement, disclosure activities and GRM implementation performances.



Stakeholders will be kept informed as the project develops, including reporting on project E&S performance and implementation of the SEP and GRM, and on the project's overall implementation progress.

## 5. Resources and Responsibilities for implementing stakeholder engagement activities

### 5.1 Resources

The Gender Division will be in charge of stakeholder engagement activities. However, the stakeholder consultation and disclosure activities for the project will be covered by the respective Components of the project. Gender Division will allocate adequate budgetary resources for the implementation of the SEP throughout the project period. The budget for the SEP is **US\$1,057,260.00** and is included in the ISSB component of the project.

*Table 5 Budget*

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs (\$)
<b>1. Estimated staff salaries* and related expenses</b>				
1a. [E.g., communications consultant]	4	100,000	1	40,000.00
1b. [E.g., travel costs for staff]	20	25,000	1	500,000.00
1c. [E.g., estimated salaries for Community Liaison Officers]	3000	180,000	2	360,000.00
<b>2. Events</b>				
2a. [E.g., organization of focus groups]				
<b>3. Communication campaigns</b>				
3a. [E.g., posters, flyers]	4	12,000	2	96,000.00
3b. [E.g., social media campaign]	4	100,000	2	80,000.00
<b>4. Trainings</b>				
4a. [E.g., training on social/environmental issues for PIU staff]	8	150,000	2	300,000.00
4b. [E.g., training on gender-based violence (GBV) for Project Implementing Unit (PIU) ]	8	150,000	2	240,000.00
<b>5. Beneficiary surveys</b>				
5a. [E.g., mid-project perception survey]	2	250,000	1	100,000.00
5b. [E.g., end-of-project perception survey]	2	250,000	1	100,000.00
<b>6. Grievance Mechanism</b>				
6a. [E.g., training of GM committees]	8500	50,000	4	50,000.00
6b. [E.g., Complaint Boxes boxes in villages and schools]	9000	200,000	4	50,000.00
Budget Category	Quantity	Unit Costs	Times/Years	Total Costs (\$)
6c. [E.g., GM communication materials]	4	150,000,	8	40,000.00
<b>7. Other expenses</b>				
7a. [insert]				
<b>TOTAL STAKEHOLDER ENGAGEMENT BUDGET:</b>				<b>1,057,260.00</b>

Note: \*Salary costs are indicative.

### 5.2 Management functions and responsibilities

The entities responsible for carrying out stakeholder engagement activities are Gender Division, MCDSS, MOH, and MOE. However, Gender Division will coordinate all stakeholder engagement processes activities. Further, the GRM/GBV/Safeguard Specialists from the various Ministries' Project

Implementation Units or assigned to support GEWEL 2 will support the Gender Division to implement all various activities envisaged in the SEP.

The stakeholder engagement activities with various project stakeholders at different levels (national, provincial, district and community) will be documented. Gender Division will disclose the information about the project into its website in a manner that is commensurate with the nature of the identified stakeholders and E&S sensitivity of the project. The SEP is a living document and it will be updated whenever need arises.

## **6. Grievance Redress Mechanism**

The main objective of a GRM is to assist to resolve grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GRM is to satisfactorily address grievances from beneficiaries and non-beneficiaries of GEWEL 2. The goals of the GRM are to ensure people use the system, staff understand what is going well or poorly with program design and implementation, and communication messages around the GRM are tested and improved. The GRM is expected to address nine categories of complaints: Exit, Exclusion; Inclusion; Payment; Service Standards; Fraud and Corruption; Serious, including GBV, and other grievances not related to the GEWEL 2 project. The GRM of the current GEWEL project will be utilized for GEWEL 2, albeit strengthened for improved functionality, including the GRM manual (see annex 4) that is used by current GEWEL Grievance Focal Persons and other staff to resolve complaints related to the program.

### **6.1 Description of GM**

*Table 6 GEWEL GRM*

Step	Description of Process	Time Frame	Responsibility
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GRM implementation structure	<p>The GEWEL GRM is a harmonized GRM which cuts across the 3 components (SCT, SWL and KGS). It is coordinated by the Gender Division.</p> <p>Roles and Responsibility</p> <ol style="list-style-type: none"> <li>1. Analyze complaints and provide reports to the World Bank</li> <li>2. Supervise and monitor district implementation of GRM and provide reports to Headquarters</li> <li>3. Collect complaint forms from communities /schools; sort the complaints accordingly for each component, enter the complaints on the MIS, investigate and resolve or refer to relevant institution</li> <li>4. Assist complainants lodging in complaints,</li> <li>5. assist learners to lodge in complaints</li> </ol>	On going	<ol style="list-style-type: none"> <li>1. PIU</li> <li>2. Provincial officers</li> <li>3. Regional officers</li> <li>4. District officers</li> <li>5. School Guidance and Counseling Teachers</li> <li>6. Community Volunteers</li> </ol>
Grievance uptake	<p>Grievances can be submitted via the following channels:</p> <ol style="list-style-type: none"> <li>1. Complaint Boxes</li> <li>2. Community Focal Point Persons</li> <li>3. GBV toll free line</li> <li>4. Complaints can also be lodged via any of the channels below: <ul style="list-style-type: none"> <li>• Social Media Platform</li> <li>• Component Websites</li> <li>• Focus Group Discussions</li> <li>• WhatsApp</li> </ul> </li> </ol>	On going	<ol style="list-style-type: none"> <li>1. Community Grievance Focal Point Persons</li> <li>2. Guidance and Counseling teachers</li> <li>3. Community Welfare Assistance Committee (CWAC) members</li> </ol>
Sorting, processing	<p>The district offices from the three components (SCT, SWL and KGS) collect the complaint forms from the communities and schools monthly on a rotation basis.</p> <p>The complaints are then sorted out accordingly and each component processes their own complaints by investigating and entering on the MIS.</p>	Monthly	District officers from the three components (SCT, SWL, KGS)
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by the Community Grievance Focal Point Person or the Guidance and Counseling Teachers in schools or through Community Welfare Assistance Committee members.	upon lodging in the complaint	Local grievance focal points/ Guidance and counseling teachers
Verification, investigation, action	Verification, Investigation and resolution of the complaint is led by the respective district officers.	Within 30 working days	District officers
Monitoring and evaluation	Complaints collected are entered on the MIS, analyzed and reported monthly.	ongoing	<ol style="list-style-type: none"> <li>1. National officers</li> <li>2. Provincial officers</li> <li>3. District officers</li> </ol>
Provision of feedback	If complainants are not satisfied with the feedback provided there is provision for them to appeal	When there is need	Provincial officers and Head Quarters (PIUs)
Training	<p>PIU staff from the three components are responsible for training provincial and district staff.</p> <p>The provincial and district staff train Grievance Focal point persons /guidance, Counseling teachers and Community Welfare Assistance Committee members.</p>	On a Quarterly basis or when there is need	Head Quarters officers Provincial officers District officers

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

Potential risks related to labor and working conditions include: Occupational Health and Safety (OHS) risks, GBV and/or sexual exploitation, abuse, and harassment (SEA-H) and risk of transmission of HIV/AIDS. The

PIU will assess and address these risks by developing recruitment guidelines, procedures and appropriate OHS measures and applying relevant provisions of the Employment Act No. 3 of 2019, public service regulations and Human Resource manual.

- a) **Child labor:** Although the risk of child labor is minimal (given the recruitment criteria for all government jobs are persons above 18 years), the risk may emerge through community labor.
- b) **Forced labor:** Forced labor risk is unlikely to occur during the project lifecycle. However, there may be risks related to use of community worker volunteers by all the implementing partners from MOE, MCDSS and MOH.
- c) **Labor disputes over terms and conditions of employment:** Likely causes for labor disputes include demand for limited employment opportunities; labor wages/rates and delays of payment; disagreement over working conditions (particularly overtime payments and adequate rest breaks); and health and safety concerns in the work environment. Further, there is a risk that employers may retaliate against workers for demanding legitimate working conditions, or raising concerns regarding unsafe or unhealthy work situations, or any grievances raised, and such situations could lead to labor unrest and work stoppage.
- d) **Discrimination and exclusion of vulnerable groups** especially groups include women and persons, the elderly, and persons with disabilities: Sexual harassment and other forms of abusive behavior by workers or managers will also have the potential to compromise the safety and wellbeing of the vulnerable groups of workers and the local communities, while adversely affecting project performance.
- e) **Sexual harassment, exploitation and abuse:** there are several concerns on the potential for GBV, increased risk of abuse and exploitation, especially for vulnerable women beneficiaries and workers, among project workers, and between project workers and local communities.
- f) **Transmission of HIV/AIDS:** there are risks related to transmission of HIV/AIDS among project direct workers, community volunteers and the communities in which they will be implementing project activities. The PIU will ensure that sensitization on HIV/AIDS transmission and continuation of established relevant OHS measures on HIV/AIDS.
- g) **Payment Service Providers:** are also at risk as they receive huge sums of money when beneficiaries are being paid. They are vulnerable to theft and physical harm. Mitigation measures for payment agents are articulated in MoUs that the MCDSS signs with respective Payment Service Providers.

This section lists the key national employment and labor legislation with regards to term and conditions of work, Occupational health, and conditions of employment:

1. The Constitution of Zambia Article 24;
2. The Employment Code Act No. 3 of 2019;
3. Public Health Act Chapter 265 of the Laws of Zambia;
4. Occupational Health and Safety Act No 36 of 2010;
5. The Industrial and Labour Relations Act, Chapter 269; and
6. The National Pensions and Social Security Scheme Act, 2018.

These are the key pieces of legislation that govern employment and labor relations in Zambia. However, it's important to note that other laws and regulations may also apply depending on the specific industry, sector or circumstances of an employment relationship.

## 6.2 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by the World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred or could occur, as a result of WB's non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been allowed to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## **7. Monitoring and Reporting**

### **7.1 Summary of how SEP implementation will be monitored and reported**

The monitoring and reporting for the SEP will be done as part of the overall GEWEL 2 monitoring and reporting plan and schedule. The project will conduct surveys to gauge stakeholders' satisfaction with the engagement process, communication channels, and level of influence they feel they have. Effectively measuring stakeholder engagement is crucial to ensuring that activities are meeting their needs and achieving desired outcomes. In addition to surveys, interviews with key stakeholders to gain in-depth insights into their perspectives and concerns will be undertaken. These will take the form of focus group discussions (FGDs): FGDS will be used to facilitate discussions and gather feedback from a group of stakeholders especially for community level stakeholders. Additionally, observations will be used to observe stakeholder interactions and activities to gather data on their engagement levels. The best method will depend on specific needs and resources. Reporting and monitoring of the stakeholder engagement plan for GEWEL 2 will be an ongoing process. This will support the regular review of the plan to make adjustments as needed to ensure it remains effective and relevant.

The indicators for the stakeholder engagements will be included in the GEWEL 2 quarterly progress narrative report and the results framework. Each component prepares input to the quarterly progress narrative report and submits it to the Gender Division for compilation and submission to the World Bank. The indicators for the SEP will sit under the Gender Division ISSB component. Indicators for the SEP will cover information disclosure, stakeholder engagements and consultations, with the following included for reporting under the quarterly progress narrative report:

1. Number of Consultative meetings held
2. Number of Decisions Influenced (This measures the number of decisions made or modified as a result of stakeholder input and feedback.)
3. Number of Complaints and Grievances (Track the number of complaints and grievances received from stakeholders, and analyze their root causes to address underlying issues.)
4. Social Media Engagement (Monitor the level of engagement on social media channels, such as likes, shares, and comments.)

### **7.2 Reporting back to stakeholder groups**

The SEP will be periodically revised and updated as necessary in the course of project implementation. On a quarterly basis the summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. The quarterly reports summaries will provide a mechanism for assessing both the number and 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 various ways including the following:

1. *Written reports*: These will be formal or informal and will be distributed electronically or through hard copy.
2. *Meetings*: These will provide an opportunity for face-to-face interaction and discussion.
3. *Webinars*: These are a good option for reaching geographically dispersed stakeholders.
4. *Websites*: These will be used to provide ongoing updates and information.
5. *Social media*: This will be used to reach a wider audience and engage stakeholders in conversation.

## **Annexes**

### **Annex 1: Eastern Province Attendance Registers**



Stakeholder Engagement - Eastern Province.pdf

### **Annex 2: Eastern Province Consultations Report**



Report on SE eastern province.pdf

**Annex 3: Copperbelt Consultations**



Stakeholder Consultation Registers and Meetings Minutes.pdf

**Annex 4: GRM Manual**



GEWEL GRM Manual - FINAL.pdf