

# Sierra Leone Free Education Project

## Stakeholder Engagement Plan (SEP)

Ministry of Basic and Senior Secondary Education

May 2019

# Stakeholder Engagement Plan (SEP)

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## ABBREVIATIONS AND ACRONYMS

ASC	Annual School Census
CBO	Community-Based Organization
CERC	Contingent Emergency Response Component
CoP	Communities of Practice
EMIS	Education Management Information System
EPA	Environmental Protection Agency
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESP	Education Sector Plan
ESRS	Environmental and Social Review Summary
GBV	Gender-based Violence
GRM	Grievance Redress Mechanisms
GRS	Grievance Redress Service
HCI	Human Capital Index
IDA	International Development Association
IPF	Investment Project Financing
JSS	Junior Secondary School
LC	Local Council
M&E	Monitoring and Evaluation
MBSSE	Ministry of Basic and Senior Secondary Education
MIS	Management Information System
MoF	Ministry of Finance
NDP	National Development Plan
PFMU	Project Fiduciary Management Unit
PIU	Project Implementation Unit
REDiSL	Revitalizing Education Development in Sierra Leone
SBM	School-based Management
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SGBV	Sexual and Gender-based Violence
SMC	School Management Committee
SSS	Senior Secondary School
TSC	Teaching Service Commission
WAEC	West African Examinations Council

## 1. INTRODUCTION

The proposed Free Education Project is a five-year International Development Association (IDA)-funded project supported with a US\$70 million credit. The project's main implementing agency is the Ministry of Basic and Senior Secondary Education (MBSSE). Activities supported under the proposed project would aim to address school- and system-level challenges facing the education sector building on successful activities and approaches supported under the on-going Revitalizing Education Development in Sierra Leone (REDiSL) Project and existing research on effective approaches in Sierra Leone and in other settings. The proposed Project will be comprised of five components: Component 1 – School Improvement Program; Component 2 - Teacher Professional Development and Management; Component 3 - System Administration, Governance and Accountability; Component 4 - Program Management, Coordination and Monitoring and Evaluation. Component 5 is a Contingent Emergency Response Component (CERC), which allows for rapid reallocation of project proceeds in the event of a natural or man-made disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact.

The project is well-aligned with Government and World Bank priorities and strategies focusing on addressing education sector challenges and transforming the education system in the long-term. Its primary objective is to increase the number of children in schools with improved learning conditions and better teaching practices and to strengthen system accountability. The project's main implementing agency is the Ministry of Basic and Senior Secondary Education (MBSSE) and the project will be implemented using the World Bank's Environmental and Social Framework (ESF). The Bank's Environmental and Social Development Specialists prepared an Environmental and Social Review Summary (ESRS) which included information on the type and scope of the proposed project, its potential risks and impacts; and the Environmental and Social Risk Classification (ESRC) which has a preliminary classification as Moderate.

The project will invest in physical infrastructure and has the potential to generate significant opportunities in many ways; improving quality learning outcomes, improving school completion rate, training and capacity building, opportunities for employment etc. In line with the government's commitment to inclusive education the project will pay special attention to issues affecting persons with disabilities and other vulnerable social groupings as well as closely monitor the key social issues identified by the initial environmental and social screening such as gender, gender-based violence [GBV], disability inclusion. Further analysis and consultation on these issues should reveal constraints and opportunities to promote equal access to the project related benefits.

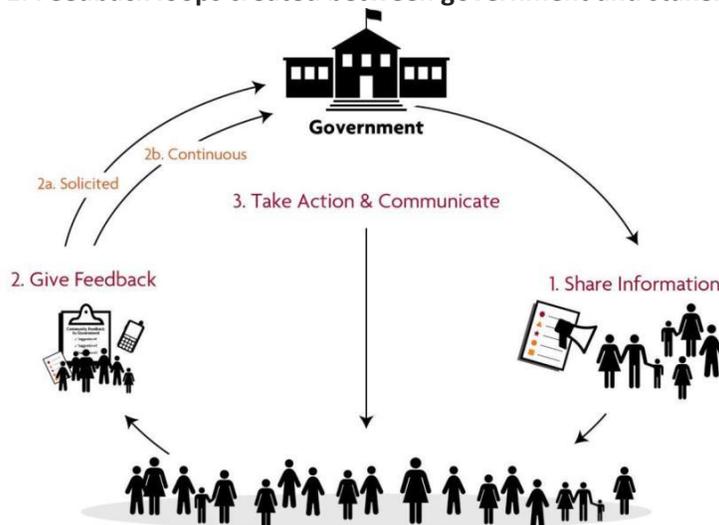
## 2. STAKEHOLDER ENGAGEMENT

The World Bank has a long history of multi-stakeholder engagement and strategies to promote effective project preparation, project implementation and project monitoring, which entails empowering citizens to participate in the development process and integrating citizen voice in development programs as key accelerators to achieving results. Therefore, the World Bank is committed to mainstreaming stakeholder engagement in operations it supports in order to improve outcomes.

Stakeholder engagement is defined as the two-way interaction between stakeholders and the government implementing agencies within the scope of the project that gives stakeholders a voice in decision-making with the objective of improving the intermediate and final development outcomes of the

intervention (see figure 1). The spectrum of stakeholder engagement includes consultation, collaboration and participation, and integration and responsiveness to stakeholder concerns leading empowerment.

**Figure 1. Feedback loops created between government and stakeholders**



As a part of project preparation, the Government has carried out a Stakeholder Engagement Analysis which was aimed at identifying (i) who will be directly or indirectly affected by the project, (ii) how the project to reach out to stakeholders, and (iii) how would the project share information and get stakeholders involved in the decision-making and implementation of the project. This Stakeholder engagement Plan therefore summarizes findings of the analysis and describes the timing and methods of engagement with stakeholders throughout the life-cycle of the project. The process of preparing the Stakeholder Engagement Plan was inclusive as it was designed to accommodate the needs and circumstances of diverse range of stakeholders, paying special attention to identified disadvantaged or vulnerable individuals or groups with consideration for stakeholders’ communication and physical accessibility challenges.

### 3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

During the project identification and preparation stage, several consultations took place at the national level involving the MBSSE and at the local and school levels involving other agencies and key stakeholders (see table 1).

**Table 1. List of stakeholder Engagement Activities conducted during the project identification and preparation stage**

Stakeholder	Main topics discussed
MBSSE	<ul style="list-style-type: none"> <li>Challenges facing the MBSSE.</li> <li>Goals/objectives MBSSE wants to achieve.</li> <li>Strategies to achieve the goals.</li> <li>Indicators the MBSSE wants to use to measure attainment of the goals (results framework).</li> <li>Monitoring mechanism for the project.</li> </ul>

Stakeholder	Main topics discussed
	<ul style="list-style-type: none"> <li>Implementation arrangement for the project.</li> </ul>
MoF	<ul style="list-style-type: none"> <li>Alignment of the project with national strategy.</li> <li>Investment viability of the project.</li> <li>Sustainability considerations in the project design.</li> <li>Contribution of the project to the county's economic development, poverty reduction and shared prosperity.</li> <li>Contribution of the project to enhanced human capital.</li> </ul>
PFMU	<ul style="list-style-type: none"> <li>Challenges facing the PFMU.</li> <li>Aspects that need improvement to enhance the operations of PFMU.</li> </ul>
Local Government Finance Department (LGFD)	<ul style="list-style-type: none"> <li>Educational decentralization work in the country.</li> <li>Roles and responsibilities devolved to local level.</li> </ul>
TSC	<ul style="list-style-type: none"> <li>Challenges the TSC is facing.</li> <li>Goals/objectives TSC wants to achieve.</li> <li>Strategies to achieve the goals.</li> <li>Strategies to improve teacher management and teacher Deployment.</li> <li>Functions and operations of TSC (human resources, budget, annual plan, activities).</li> </ul>
WAEC	<ul style="list-style-type: none"> <li>Challenges the WAEC is facing.</li> <li>Goals/objectives WAEC wants to achieve.</li> <li>Strategies to achieve the goals.</li> <li>Strategies to improve quality of examinations.</li> <li>Functions and operations of WAEC (human resources, budget, annual plan, activities).</li> </ul>
Local Councils	<ul style="list-style-type: none"> <li>Educational decentralization work in the country.</li> <li>Roles and responsibilities devolved to local level.</li> <li>Monitoring of schools by LCs.</li> <li>How LCs support education activities.</li> <li>How LCs work with District Education Offices.</li> <li>Existing Committees at the LCs and district levels.</li> <li>Budgetary allocations for education at the LCs.</li> </ul>
District Education Offices	<ul style="list-style-type: none"> <li>Educational decentralization work in the country.</li> <li>Role of District Education Offices (DEOs).</li> <li>Interaction between DEOs and schools.</li> <li>How the DEOs support education activities.</li> <li>How the DEOs work with LCs.</li> <li>Existing committees at the district levels.</li> </ul>
School heads	<ul style="list-style-type: none"> <li>Does SMC function well?</li> <li>How the performance-based grant work.</li> <li>Challenges facing schools.</li> <li>Monitoring visits by inspectors, supervisors, local councils, district education offices, local TSC.</li> <li>Community support in school management.</li> <li>Main causes of children's dropout.</li> <li>Supply of teaching and learning materials (e.g. textbooks) Effects of the Free Quality Education Program on student enrollment.</li> </ul>

Stakeholder	Main topics discussed
	<ul style="list-style-type: none"> <li>• Does the school charge parents any fees?</li> <li>• Challenges teachers are facing.</li> <li>• Professional development training for teachers.</li> <li>• Issues on gender, GBV and inclusive education.</li> <li>• Actions to take to address GBV, gender, inclusive education.</li> </ul>
Teachers	<ul style="list-style-type: none"> <li>• Challenges facing schools.</li> <li>• Competences and qualifications of teachers.</li> <li>• Monitoring visits by inspectors, supervisors, local councils, district education offices, local TSC.</li> <li>• Community support in school management.</li> <li>• Causes of children’s dropout.</li> <li>• Supply of teaching and learning materials (e.g. textbooks).</li> <li>• Effects of the Free Quality Education Program on student enrollment.</li> <li>• Does the school charge parents any fees?</li> <li>• Challenges teachers are facing.</li> <li>• Do teachers receive professional development training?</li> <li>• Are there any issues relating to gender, GBV and inclusive education?</li> </ul>
Parents	<ul style="list-style-type: none"> <li>• Functions and operations of SMC</li> <li>• Presence of PTA in schools</li> <li>• Payment of school fees by parents</li> <li>• Awareness on how the performance-based grant is spent and utilized?</li> <li>• Challenges schools face</li> <li>• Satisfaction by parents with school performance</li> <li>• Sharing information by schools</li> <li>• Community support in school management</li> <li>• Causes of children’s dropout.</li> <li>• Issues on gender, GBV and inclusive education</li> </ul>
Students	<ul style="list-style-type: none"> <li>• Access to information.</li> <li>• Information disclosure</li> <li>• Issues of gender, GBV, and inclusive education.</li> <li>• Child labor/forced labor</li> </ul>
Communities	<ul style="list-style-type: none"> <li>• School performance</li> <li>• Access to information</li> <li>• Information disclosure</li> <li>• Issues on gender, GBV and inclusive education</li> </ul>
NGOs	<ul style="list-style-type: none"> <li>• Activities of NGO in education sector</li> <li>• Challenges schools are facing</li> </ul>
Development partners (DPs)	<ul style="list-style-type: none"> <li>• Support provided by DPs in the education sector</li> <li>• Challenges schools are facing</li> <li>• Issues on gender, GBV and inclusive education</li> </ul>

#### 4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

#### 4.1. Target Stakeholders and Other Interested Parties

In this framework, the following people are considered as stakeholders: (i) those who are affected or likely to be affected by the project; (ii) those who may have an interest in the project. Table 2 summarizes affected (target stakeholders) and non-affected parties who may be directly or indirectly affected by the project.

**Table 2. List of Potentially Affected Stakeholders and Other Interested Parties**

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
<b>Component 1: School Improvement Program</b>			
1.1 Performance based school financing	MBSSE, heads, teachers and SMCs/Board of governors	Provision of performance-based financing (PBF)	MoF, Policy makers, communities, NGOs
1.2 Physical improvement to learning environment	Local contractors	Renovation and construction of schools	Ministry of Lands, Local contractors, Chiefs and local authorities, EPA, Ministry of Works, Ministry of Labor, Ministry of Social Welfare, Gender and children Protection (MSWFGP)
	Heads, teachers, SMCs	Maintenance of infrastructure	
	Local Council, communities	Community engagement Information and communication	
	Local councils, community, chiefs	Provision of land, permission from the local authorities and the traditional heads. Community ownership of the project	
	School pupils/ students	Users of school infrastructure	
1.3 Provision of supplementary reading materials	Heads, teachers, MBSSE, parents, pupils/ students	Provision of reading materials Digital libraries	Parents, local community, NGOs/community-based organizations (CBOs)
<b>Component 2: Teacher Professional Development and Management</b>			
2.1 Cluster based continuous professional development	TSC	Provision of the framework for professional development, guidance and review of continuous professional development	Tertiary institutions, NGOs
	Teachers	Career development and training	SLTU
2.2 Strengthening TSC for efficiency teacher management and deployment	TSC	Capacity building Database on teachers	SLTU
	MBSSE	Capacity building Digital Database for recruitment and deployment	MBSSE (MSWFGP)
<b>Component 3: Systems Administration, Governance and Accountability</b>			

3.1 Strengthening curriculum and assessment framework	MBSSE, WAEC, Headteachers TSC Local Council	Curriculum review (gender and disability, special needs teacher training Monitoring and evaluation	NGOs MSWGCA SLTU
3.2 Strengthening planning and system management	MBSSE, headteachers	Capacity building	MoF, policy makers
3.3 Promoting gender equality in education	MBSSE, Headteachers, Teachers and gender advocacy and women rights groups	Capacity building, gender and disabilities visibility, Curriculum diversity, A safe environment from sexual harassment and school based GBV, safeguarding policy and referral pathway strengthen Guidance counselors	Local community, Traditional leaders, Religious leaders, NGOs, MSWGCA
<b>Component 4: Program Management, Coordination and Monitoring and Evaluation</b>			
4.1 Program Management and coordination Monitoring and Evaluation	MBSSE MoF	Oversight and evaluation Capacity building	Local councils

#### 4.2. Potential Roles, Interest and Influence of Key Stakeholders

Table 3 maps out the potential role, interest and influence in the SEA for each of the stakeholders.

**Table 3. Potential Roles, Interest and Influence of Key Stakeholders**

Stakeholder	Potential Role of Stakeholder	Interest	Influence
MBSSE	Provides administrative oversight and coordination for project Lead in stakeholder engagement and consultations Lead in complaints and grievance redress	High	High
MoF	Allocate financial resources	High	High
Ministry of Justice	Provides legal advice to project	low	low
PFMU	Day-to-day Fiduciary coordination of project	High	High
Local Government Finance Department (LGFD)	Disburses funds to SMCs	High	Medium
TSC	Provision of the framework, guidance and review of continuous professional development	High	Medium
WAEC	Curriculum review and performance assessment standards	Medium	Low
Local Councils	Community engagement Information and communication	High	High

Stakeholder	Potential Role of Stakeholder	Interest	Influence
District Education Offices	Curriculum review and performance assessment standards, Supervision	High	High
School heads, Teachers, SMCs	Career development and training, administration of funds and supervision	High	High
School Pupils/ students	Beneficiaries of Project interventions	High	Low
Local contractors	Renovation and construction of schools	High	Medium
Parents	Quality of teaching and learning	High	Medium
Local community, chiefs	Provision of land, permission from the local authorities and the traditional heads. Community ownership of the project	High	High
NGOs	safeguarding policy and referral pathway strengthen Guidance counselors	Medium	Medium
Media	Dissemination of information in local and national news	High	Medium
Development partners (DPs)	budgetary support and technical assistance	Medium	High

#### 4.3. Disadvantaged / Vulnerable Individuals or Groups

Disadvantaged/vulnerable individuals and groups, who often do not have a voice to express their concerns or understand the impacts of a project, are sometimes excluded from stakeholder engagement. Table 4 shows potential disadvantaged/vulnerable individuals/groups and limitations they may have regarding participating in in the consultation process.

**Table 4. List of Disadvantaged/Vulnerable Individuals/Groups**

Project component	Vulnerable groups and individual	Peculiar Characteristics/ Needs	Preferred means of notification/Consultation	Additional Resources Required
<b>1. School Improvement Program</b>				
1.1 Performance-based School Financing	School stakeholders in remote poor rural areas	Remote Distance, Poor Communication network	community level meetings/fora, Community notices Local radio	Provide transportation from rural areas to meeting places, provision of information on noticeboards, recruitment of volunteers to disseminate information to remote areas
1.2 Physical Improvements to the Learning Environment	Physically challenged persons with visual and hearing impairment	Lack of access to meeting places, long distance to school infrastructure, meetings Transportation, language barrier, visual impairment	Meet Disability Commission, Local/community radio, the media	Provide transportation cost to persons with disability to participate, Information translated to indigenous languages, sign language/ braille

<b>Project component</b>	<b>Vulnerable groups and individual</b>	<b>Peculiar Characteristics/ Needs</b>	<b>Preferred means of notification/Consultation</b>	<b>Additional Resources Required</b>
1.3 Provision of Supplementary Reading Materials	Visually and hearing impaired, illiterate persons	Lack of braille or sign language, language barrier	In schools and local community	Audio devices, braille, sign languages, translators, infographics
<b>2. Teacher Professional Development and Teacher Management</b>				
2.1 Cluster-based Continuous Professional Development for Teachers	teachers with physical disabilities (mobility, hearing, and vision impairment)	Accessibility, lack of information and funding for training in special needs	Special training needs such as braille, audio devices, accessible venues	Braille, special training facilitators, sign language translators/interpreters
2.2 Strengthening TSC for Efficient Teacher Management and Deployment	Teachers in remote areas	Accessibility, lack of information, limited voice	More information dissemination through the local radio and town criers, posters, local language skits and discussions.	Transportation
<b>3. System Administration, Governance and Accountability</b>				
3.1 Strengthening Curriculum and Assessment Framework	Local communities, Women/Federation/Association of Persons with Disability	Limited voice, low representation, lack of access to information,	Focus group meetings, Engagement at the local level including the use of radio and town hall meetings	Transportation
3.2 Strengthening Planning and System Management	Local communities, women/Girls People with disabilities (Disability Commission)	Limited voice, low representation, lack of access to information,	Focused group meetings, engagement at the local level including the use of radio and town hall meetings	Transportation
3.3 Promoting Gender Equality in Education	Women, girls, poor and disadvantaged children pregnant school age girls	Cultural and traditional barriers poverty stigma	focus group meeting, use of gender champions,	Engagement of local NGOs and CBOs who work with vulnerable people at the community level to help disseminate information and organize consultation
<b>4. Program Management, Coordination and Monitoring and Evaluation</b>				

Project component	Vulnerable groups and individual	Peculiar Characteristics/ Needs	Preferred means of notification/Consultation	Additional Resources Required
Program Management, Coordination and Monitoring and Evaluation	Stakeholders in remote areas	Limited voice, Low representation, Lack of access to information,	Focus group meetings, engagement at the local level including the use of radio and town hall meetings	More information dissemination through the local radio and town criers, posters, local language skits and discussions. Community level engagement/consultations rather than at a district headquarters

## 5. STAKEHOLDER ENGAGEMENT PROGRAM

### 5.1. Purpose and Timing of Stakeholder Engagement Program

As set out in ESS10, stakeholder engagement is an inclusive process that must be conducted throughout the project life cycle. Table 5 presents an outline of key stakeholder engagement activities to take place during the project preparation stage through to implementation and closure.

**Table 5. Proposed Stakeholder Engagement at Preparation stage**

Project component	Target stakeholders	Expected discussion and decisions
<b>Project preparation stage</b>		
<b>1. School Improvement Program</b>		
1.1 Performance-based School Financing	<ul style="list-style-type: none"> <li>MBSSE and District Education Offices</li> <li>SMCs and school heads</li> </ul>	<ul style="list-style-type: none"> <li>How Performance-based financing (PBF) can be improved.</li> <li>Stakeholders understanding of the purpose of PBF and use of the funds for intended purposes.</li> <li>Inclusive process for designing and agreeing on intervention for financing</li> <li>How Monitoring will be conducted.</li> </ul>
1.2 Physical Improvements to the Learning Environment	<ul style="list-style-type: none"> <li>MBSSE, local councils, district education offices</li> <li>SMCs and school heads, teachers and pupils</li> <li>traditional and opinion leaders, local communities</li> <li>EPA</li> <li>Ministry of Labor</li> <li>MSWFGP</li> <li>NGO/CSOs</li> <li>GRM</li> </ul>	<ul style="list-style-type: none"> <li>Environmental and Social Risk Assessment and mitigation plans</li> <li>Organizational structure for E&amp;S implementation</li> <li>Project Grievance Mechanisms</li> <li>Disclosure of ESMF, RPF, SEP, ESCP and other related E&amp;S information</li> <li>Effective ways to provide school infrastructure.</li> <li>Supervision of school infrastructure and maintenance of quality standard.</li> <li>GRM dissemination</li> </ul>

<b>Project component</b>	<b>Target stakeholders</b>	<b>Expected discussion and decisions</b>
1.3 Provision of Supplementary Reading Materials	<ul style="list-style-type: none"> <li>• MBSSE</li> <li>• SMCs and school heads, teachers and pupils/ Students</li> </ul>	<ul style="list-style-type: none"> <li>• Teachers utilization of reading materials to improve children's reading proficiency.</li> <li>• Reading Materials in accessible formats for teachers and students with disabilities</li> <li>• Reading materials to include sex and adolescent education and GBV relevant information targeting boys and girls.</li> </ul>
<b>2. Teacher Professional Development and Teacher Management</b>		
2.1 Cluster-based Continuous Professional Development for Teachers	<ul style="list-style-type: none"> <li>• TSC</li> <li>• Teachers</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthening pedagogical skills by TSC.</li> <li>• Effective use of teacher and other teaching aids by teachers</li> <li>• Improvement of teachers teaching skills after the training.</li> </ul>
2.2 Strengthening TSCs for Efficient Teacher Management and Deployment	<ul style="list-style-type: none"> <li>• TSC</li> </ul>	<ul style="list-style-type: none"> <li>• Issues TSC encounter regarding teacher management and deployment</li> <li>• Incentives for deployment of teachers, especially female teachers to remote areas</li> </ul>
<b>3. System Administration, Governance and Accountability</b>		
3.1 Strengthening Curriculum and Assessment Framework	<ul style="list-style-type: none"> <li>• MBSSE, WAEC</li> <li>• School heads</li> </ul>	<ul style="list-style-type: none"> <li>• How curriculum and assessment framework can be improved and be more inclusive.</li> <li>• What capacity building is needed.</li> </ul>
3.2 Strengthening Planning and System Management	<ul style="list-style-type: none"> <li>• MBSSE</li> <li>• School heads</li> </ul>	<ul style="list-style-type: none"> <li>• How annual school census (ASC) is conducted.</li> <li>• What information needs to be captured through (ASC).</li> <li>• How to ensure quality assurance</li> <li>• How EMIS system can be improved.</li> </ul>
3.3 Promoting Gender Equality in Education	<ul style="list-style-type: none"> <li>• MBSSE</li> <li>• Schools heads and SMCs</li> <li>• NGOs and DPs</li> </ul>	<ul style="list-style-type: none"> <li>• What gender related issues exist.</li> <li>• How the project can address gender issues.</li> <li>• What activities are implemented by other partners.</li> </ul>
<b>4. Program Management, Coordination and Monitoring and Evaluation</b>		
Program Management, Coordination, Monitoring and Evaluation	<ul style="list-style-type: none"> <li>• MBSSE</li> <li>• PFMU of MoF</li> <li>• Local council</li> </ul>	<ul style="list-style-type: none"> <li>• How to monitor the project activities and achievement of results framework</li> </ul>
<b>Project implementation stage</b>		
<b>1. School Improvement Program</b>		
1.1 Performance-based School Financing	<ul style="list-style-type: none"> <li>• MBSSE and District Education Offices</li> <li>• SMCs and school heads</li> <li>• Ward education committees</li> <li>• Local councils</li> </ul>	<ul style="list-style-type: none"> <li>• Whether schools improved school performance (students, teachers) after receiving PBF.</li> <li>• Whether school stakeholders understand the purpose of PBF and use the funds for intended purposes.</li> <li>• Whether monitoring mechanism works.</li> </ul>
1.2 Physical Improvements to the Learning Environment	<ul style="list-style-type: none"> <li>• MBSSE, local councils, district education officers, EPA</li> </ul>	<ul style="list-style-type: none"> <li>• Sub-project Environmental and social screening</li> </ul>

Project component	Target stakeholders	Expected discussion and decisions
	<ul style="list-style-type: none"> <li>• SMCs and school heads, teachers and pupils</li> <li>• traditional and opinion leader, local communities</li> <li>• EPA</li> <li>• Ministry of Labor</li> <li>• MSWFGP</li> <li>• WASH NGO/CSOs</li> <li>• District environmental officers,</li> <li>• Local councils</li> </ul>	<ul style="list-style-type: none"> <li>• Assessment and preparation of ESHIA, ESMP,</li> <li>• RAPs as needed</li> <li>• Disclosure of any follow up safeguards instruments</li> <li>• Compensation and resettlement as required</li> <li>• Training and awareness on community Health and Safety including GBV prevention</li> <li>• Awareness on project GRM</li> <li>• Environmental permitting</li> <li>• How school infrastructure improvement can take place.</li> <li>• What kinds of challenges are identified at implementation stage?</li> <li>• Whether monitoring and supervision take place.</li> </ul>
1.3 Provision of Supplementary Reading Materials	<ul style="list-style-type: none"> <li>• MBSSE</li> <li>• Headteachers</li> <li>• teachers</li> </ul>	<ul style="list-style-type: none"> <li>• Whether reading materials are delivered to schools on time.</li> <li>• Whether teachers use materials to improve children's reading proficiency.</li> </ul>
<b>2. Teacher Professional Development and Teacher Management</b>		
2.1 Cluster-based Continuous Professional Development for Teachers	<ul style="list-style-type: none"> <li>• TSC</li> <li>• Teachers</li> <li>• Headteachers</li> </ul>	<ul style="list-style-type: none"> <li>• Whether TSC has developed good professional training program.</li> <li>• Whether teachers are using the tablet effectively.</li> <li>• Whether there is an improvement in teacher performance.</li> </ul>
2.2 Strengthening TSC for Efficient Teacher Management and Deployment	<ul style="list-style-type: none"> <li>• TSC</li> <li>• Teachers</li> </ul>	<ul style="list-style-type: none"> <li>• What is the strategy developed to improve teacher management and deployment</li> </ul>
<b>3. System Administration, Governance and Accountability</b>		
3.1 Strengthening Curriculum and Assessment Framework	<ul style="list-style-type: none"> <li>• MBSSE, WAEC</li> <li>• School heads</li> <li>• teachers</li> </ul>	<ul style="list-style-type: none"> <li>• Whether activities are implemented as scheduled.</li> <li>• Whether capacity is built by the project interventions.</li> </ul>
3.2 Strengthening Planning and System Management	<ul style="list-style-type: none"> <li>• MBSSE</li> <li>• School heads</li> <li>• teachers</li> </ul>	<ul style="list-style-type: none"> <li>• What implementation challenges are identified.</li> <li>• Whether the project achieved expected results.</li> </ul>
3.3 Promoting Gender Equality in Education	<ul style="list-style-type: none"> <li>• MBSSE</li> <li>• Schools heads and SMCs/Board of Governors</li> <li>• NGOs and DPs</li> </ul>	<ul style="list-style-type: none"> <li>• Whether the project has addressed gender issues.</li> <li>• What challenges are identified.</li> </ul>
<b>4. Program Management, Coordination and Monitoring and Evaluation</b>		

Project component	Target stakeholders	Expected discussion and decisions
Program Management, Coordination, Monitoring and Evaluation	<ul style="list-style-type: none"> <li>• MBSSE</li> <li>• PFMU of MoF</li> <li>• Local councils</li> </ul>	<ul style="list-style-type: none"> <li>• Whether the project achieved the targets.</li> <li>• Whether project management, coordination, monitoring and evaluation are implemented properly.</li> </ul>

## 5.2. Proposed Strategy for Information Disclosure

Table 6 describes what information will be disclosed, how it will be disclosed and the frequency with which it will be disclosed to each of the stakeholder groups.

**Table 6. Strategy for Information Disclosure**

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timetable/ Frequency	Target stakeholders	Responsible stakeholders
<b>1. School Improvement Program</b>					
1.1 Performance-based School Financing	School performance information and information on use of PBF	School feedback form displayed in school board	Every term	Parents, communities, and civil society	SMCs, Board of governors
1.2 Physical Improvements to the Learning Environment	ESMF, RPF, Stakeholder Engagement Plan, ESCP Infrastructure improvement plan, construction schedule, GRM documents	Disclose in country in two local newspapers and on the government website. Hard copy should be available in key institutions.  Posted on local council/community noticeboards and radios.	Before appraisal  After infrastructure improvement plan is approved	Civil society, local communities, Parents, building contractors	MBSSE  Local Councils. SMCs/ Board of Governors
1.3 Provision of Supplementary Reading Materials	Information on delivery date of materials	Notification displayed in school board	When schools receive notification of delivery	Parents, SMCs, and communities	School heads, teachers
<b>2. Teacher Professional Development and Teacher Management</b>					
2.1 Cluster-based Continuous Professional	Training information	Through district TSC and school heads, website of TSC	After training date is set	Teachers	TSC SLTU

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timetable/ Frequency	Target stakeholders	Responsible stakeholders
Development for Teachers		SLTU			
2.2 Strengthening TSC for Efficient Teacher Management and Deployment	Strategy of teacher management and deployment	Through district TSC, website of TSC SLTU	Throughout the project	Teachers, civil society	TSC SLTU
<b>3. System Administration, Governance and Accountability</b>					
3.1 Strengthening Curriculum and Assessment Framework	Findings of national assessment	National assessment report and dissemination workshop	After national assessment is analyzed	Government officials TSC, SLTU School heads and teachers	MBSSE
3.2 Strengthening Planning and System Management	Results of school annual census School standards	Report Website of MBSSE and social media	After the completion of activities	School stakeholders Government officials	MBSSE
3.3 Promoting Gender Equality in Education	Supporting information on prevention and responses to school-based gender violence	Website of MBSSE, social media, poster on local councils, and newspapers	As needed	Students, parents, SMCs and communities	MBSSE
<b>4. Program Management, Coordination and Monitoring and Evaluation</b>					
Program Management, Coordination and Monitoring and Evaluation	Information on the project results framework	Government's website	Bi-annual	Civil society Local councils Community Monitoring groups	MBSSE and PFMU

### 5.3. Proposed Strategy for Consultation

Table 7 is a proposed strategy for consultation. Methods vary depending on target audience, nature of activities and level of interest of the stakeholder group in project activity.

**Table 7. Strategy for Information Disclosure**

Project component	Topic of consultation	Methods used	Timetable	Target stakeholders	Responsibilities
<b>1. School Improvement Program</b>					
1.1 Performance-	PBF implementation	Focus group discussion and	Every term	SMCs	MBSSE

<b>Project component</b>	<b>Topic of consultation</b>	<b>Methods used</b>	<b>Timetable</b>	<b>Target stakeholders</b>	<b>Responsibilities</b>
based School Financing		interview with stakeholders			
1.2 Physical Improvements to the Learning Environment	Infrastructure improvement plan	Meetings and focus group discussion	After beneficiary schools are identified	SMC, local councils, local award committee	MBSSE
1.3 Provision of Supplementary Reading Materials	Monitoring of delivery to schools and utilization of materials	Meetings	After beneficiary schools are identified	District education office, local councils, local ward committee	MBSSE
<b>2. Teacher Professional Development and Teacher Management</b>					
2.1 Cluster-based Continuous Professional Development for Teachers	Development of training contents	Meetings	During the preparation stage	Teachers, DPs	TSC
2.2 Strengthening TSC for Efficient Teacher Management and Deployment	Strategy of teacher management and deployment	Interviews and meetings	Throughout the project	Teachers, government officials, DPs	TSC
<b>3. System Administration, Governance and Accountability</b>					
3.1 Strengthening Curriculum and Assessment Framework	Curriculum and assessment framework	Meetings and focus group discussions	During the preparation stage	Government officials, resource persons, Leading teachers, DPs	MBSSE
3.2 Strengthening Planning and System Management	School annual census and school standards	Meetings	During the preparation stage	Government officials, DPs	MBSSE
3.3 Promoting Gender Equality in Education	Mechanism to address gender issues	Meetings, focus group discussions, interviews.	Throughout the project	Government officials, resource persons, DPs	MBSSE
<b>4. Program Management, Coordination and Monitoring and Evaluation</b>					
Program Management, Coordination,	Project performance and the project	Meetings	Bi-annual	Government officials, local councils, Community	MBSSE and PFMU

Project component	Topic of consultation	Methods used	Timetable	Target stakeholders	Responsibilities
Monitoring and Evaluation	results framework			Monitoring group	

**5.4. Proposed Strategy to Incorporate the View of Vulnerable Groups**

The MBSSE is responsible for ensuring inclusion and representation, including for vulnerable groups. The project has developed a strategy which aims to remove obstacles to participation of such groups (see table 8).

**Table 8. Strategy to incorporate vulnerable groups**

Target groups	Strategy
Stakeholders in remote poor rural areas and who have limited access to information	<ul style="list-style-type: none"> <li>• Information translated to indigenous/local languages.</li> <li>• Robust engagement with local community-based organizations.</li> <li>• Resources allocation to wards representatives and councilors.</li> <li>• Provision of transportation or transportation cost.</li> <li>• More information dissemination through the local radio and town criers, posters, local language skits and discussions.</li> <li>• Village/chiefdom/district level meetings</li> <li>• Community level engagement/consultations than at a district headquarters.</li> <li>• Engagement of local NGO’s and CBO’s who work with vulnerable people at the community level to help disseminate information and organize consultations</li> </ul>
Females	<ul style="list-style-type: none"> <li>• The project will arrange separate consultation sessions (e.g., meetings and focus group discussion) men and women separately.</li> <li>• Smaller and gendered focus group discussions where women and girls are at ease to speak.</li> <li>• The project will use various communication measures including women associations or organizations to reach out to female groups at the district/chiefdom/village levels</li> <li>• The project will use various measures including sensitization, community empowerment, and provision of psychosocial counseling and support services to address gender issues in education such as workshops on gender issues, advocacy and media campaigns</li> </ul>
Disabled stakeholders	<ul style="list-style-type: none"> <li>• The project will use various communication measures to reach out disabled such stakeholders. (Disability Commission)</li> <li>• Information will be translated to sign language/ braille.</li> <li>• Information will be shared with them through supporting organizations. District/chiefdom/village level meetings</li> <li>• Engagement of local NGO’s and CBO’s who work with vulnerable people at the community level to help disseminate information and organize consultations.</li> </ul>
Vulnerable/ Disadvantaged families	<ul style="list-style-type: none"> <li>• The project will arrange separate consultations sessions for different target groups.</li> </ul>

	<ul style="list-style-type: none"> <li>• The project will use various communication measures to reach disadvantaged family.</li> <li>• Project Community Liaison officer/ District MSWGCA officers/Local Councils/ward committees</li> </ul>
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**5.5. Responsibilities and Resources for Implementing Stakeholder Engagement Activities**

Overall responsibility for the project will lie with the MBSSE, which will have a dedicated project secretariat that will be responsible for day-to-day project management and coordination of project activities. The Free project secretariat will provide reports of project progress and make this available to the Minister of Education and the World Bank. To function effectively, the project secretariat will have at least the following contract officers on hand: (a) Head (coordinator)(b) M&E officer, (c) Program officer, (g) environmental specialist, (d) social Specialist, and (e) Additional administration staff as needed. Other functions, including communications and human resources, will be carried out by the MBSSE with support and guidance from the project secretariat. The Secretariat (M&E officer) is also responsible for implementation of stakeholder engagement activities and GRM activities under Component 4 Project Management, Coordination, Monitoring and Evaluation (US\$6 million), working closely with the communications unit of MBSSE. Stakeholder engagement plan will be incorporated in the Project Operations Manual and Annual World Plan and Budget.

Policy direction and the oversight of the project will be carried out by an Inter-Ministerial Steering Committee at the national level for policy direction and oversight. The committee will review the overall performance of the project and decide on important policy aspects to facilitate the achievement of outcomes and results. The committee will comprise of the MBSSE (including implementing agencies), Ministry of Finance, Ministry of technical and Higher Education, World Bank, and a representative from each contributing development partners. The committee will pay special attention to stakeholder engagement in preparing, implementing and monitoring the project activities, and will report on the status of the stakeholder engagement programs during project implementation.

**6. GRIEVANCE REDRESS MECHANISM**

**6.1. Introduction**

There is currently no clearly defined GRM reporting system in the education sector. Strengthening system accountability is a key outcome of the project. To this end, the project needs to establish a grievance redress mechanism (GRM). The project is expected to strengthen accountability for beneficiaries and provide channels for project stakeholders to provide feedback on project activities. It is also expected to provide a mechanism that allows for the identification and resolution of issues affecting the project, including safeguards related complaints, misconduct of staff, misuse of funds, abuse of power, and other improper behavior. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve project impact. A separate GRM will be established by contractors during implementation to address employee grievances consistent with ESS 2.

The GRM established under the project should be accessible to all, including ethnic, religious, gender, and other special groups. The mechanism focuses not only on receiving and recording complaints but also on how complaints are resolved. The GRM should be supported by an information campaign and training.

While feedback should be handled at the level closest to the complainant, all complaints should be registered and follow the set procedures.

## **6.2. GRM scope and use**

**Scope:** The project should include a GRM that will be available for project stakeholders to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

**Who Can Use The GRM?** Project beneficiaries, project affected people (i.e. those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader citizenry can use the GRM for the purposes of making complaints or providing feedback. Project affected people include those who will be affected in resettlement issues. There should be no charge for making a complaint or conveying comments or suggestions.

## **6.3. Procedures**

### **6.3.1. Establishment of Grievance Redress Committee/Body**

The Grievance Redress Committee (GRC) shall be established by MBSSE in consultation other relevant parties to the project. The membership of the GRC shall comprise of representatives from the following;

- a. MBSSE
- b. Local Contractors
- c. Local Council/Chiefs
- d. Legal Officer
- e. NGOs/Civil society Organization
- f. Persons with Disability Association
- g. PFMU
- h. GRM Manager...

### **6.3.2. Channels to make complaints**

It is suggested that the project will establish the following channels through which citizens/beneficiaries can make complaints regarding project activities.

- a. A dedicated email address [EMAIL]
- b. A dedicated phone line [TOLL FREE NUMBER]
- c. On the project website [WEB ADDRESS]
- d. Feedback boxes located at [LOCATIONS including remote locations]
- e. Letters sent to [ADDRESS]
- f. Verbal or written complaints to project staff (directly or through project meetings). (If project stakeholders provide verbal feedback/complaint, project staff will lodge the complaint on their behalf, and it will be processed through the same channels. Project at all stages will have options for use of local languages+ interpreters when submitting complaints.
- g. Constitution of Grievance Committee members (which include women)
- h. Project meetings set up at the [specify] level, each of which include women.
- i. Oral language interpreters for lodging complaints

The project shall ensure flexibility in the channels available, make sure that different contact points are available for a person to make a verbal complaint, and that complaints addressed to the wrong person or entity are redirected to the Project secretariat.

### 6.3.3. Confidentiality and conflict of interest

Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known. For this reason, multiple channels to make a complaint have been established and conflicts of interested will be avoided.

### 6.3.4. Collection/receipt of complaints

The person receiving the complaint will complete a grievance form (see Annex 1), or make the form available to the complainant to fill out directly, and submit it without delay (within 24 hours) to the M&E officer of the Project Secretariat (GRM Manager) who is responsible for GRM. The complaints for the project will be collected and compiled by the Free Project Secretariat on a regular basis.

### 6.3.5. Sorting/categorization

Once received and filed the Free Project Secretariat will sort the complaints/feedback into the following categories

Category No.	Classification
Category 1	Safeguards, including compensation disputes, land allocation and delays in compensation
Category 2	Grievances regarding violations of policies, guidelines and procedures
Category 3	Grievances regarding contract violations
Category 4	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
Category 5	Grievances regarding abuse of power/intervention by project or government officials
Category 6	Grievances regarding Project Secretariat staff performance
Category 7	Reports of force majeure
Category 8	Suggestions
Category 9	Appreciation

### 6.3.6. Recording/logging

Once the complaints have been categorized, the GRM Manager logs the details regarding the complaint into the tracking system. This system may be manual (hard copy) or connected to the project MIS system. GRM files should be stored in a secure setting (password protected IT database or locked storage cabinet for hard copies).

Once a complaint has been logged and sorted, the GRM Manager refers the case to the Project Coordinator. The latter shall determine the following:

- The person responsible to investigate the complaint.
- The timeframe within which the complaint should be resolved.
- The agreed course of action (e.g. investigation, reply not requiring investigation, etc.).

The investigation process is determined based on the nature and gravity of the complaint, however regardless of type/category complaints all complainants should be assured of receiving feedback within 10 business days

- For resettlement-related complaints, regardless of the complexity of the case, the Social Safeguards Specialist with the Project Secretariat will be involved in the conduct of the investigation in addition to, or instead of the Investigating Officer
- For local level complaints, the investigation will be conducted by First Investigating Officer in five days.
- For complex complaints, the investigation will be conducted by Second Investigating Officer/Entity in ten days or as otherwise agreed with the GRM Manager.<sup>1</sup>

When determining who will be the investigating officer, the Project Secretariat will ensure that there is no conflict of interest, i.e. all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.

Once the investigation process has been established, the person responsible for managing the GRM records and enters this data into the log-book.

The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications.

#### **6.3.7. Notification to the complainant**

If the complainant is known, the Project Secretariat will communicate the timeframe and course of action to her/him by phone, email or mail, within two weeks of receipt of the grievance.<sup>2</sup>

Where the complainant's address is available, this should be provided in writing with a tracking number and the deadlines by which they will hear back from the Project Secretariat (see Annex 2 Notification Form).

#### **6.3.8. Investigation**

The person responsible for investigating the complaint will gather facts in order to generate a clear picture of the circumstances surrounding the grievance. Verification normally includes site visits, review of documents, a meeting with the complainant (if known and willing to engage), and a meeting with those who could resolve the issue (including formal and informal village leaders, or other leaders).

With regards to resettlement and grievances related to valuation of assets, revaluation by an independent valuer may be undertaken at the expense of the project. In case negotiations through the project GRM fails to reach an agreement. The case might have to go to the court for resolution.

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<sup>1</sup> For complex and severe complaints, senior management should be informed and assign responsibilities for conducting the investigation. Senior management should also take part in the investigation and invite observers and external experts.

<sup>2</sup>This two-week timeframe assumes the number of grievances is relatively small. The time service standard will be adjusted if the volume of grievances increases beyond a manageable level.

In cases of GBV related complaints no investigation should be conducted. Rather, cases should be referred to the NGO procured under the project to manage GBV cases for referral to the appropriate service providers.

The results of the verification and the proposed response to the complainant will be presented for consideration to the GRM committee of the MBSSE.

Once the decision has been made on the course of action and on the response to provide to the complainant, the Project Secretariat describes the actions to be taken in the grievance form (see Annex 1), along with the details of the investigation and the findings and enters it into the MIS.

#### **6.3.9. Response to complainant**

If the complainant is known, the Project Secretariat communicates the proposed action to her/him via letter, email, verbally, as received within 10 days. The complainants will also be informed by who on how s/he can appeal the action decided in the initial case.

The Project Secretariat will request feedback from the complainant as to whether s/he deems the action(s) satisfactory, and this will be recorded along with the details of the complaint and the response taken.

#### **6.3.10. Possibility to appeal**

In the event the complainant is satisfied with the response, discussions will be held in group or individually to further clarify the positions at stake. Senior management will take part in these meetings and a final decision on the action(s) will be made.

The Project Secretariat will form a Grievance Committee that will hear appeals. The Grievance Committee shall be comprised of staff from the Project Secretariat and persons who are independent from the project implementing authorities and the government. The terms of the Grievance Committee will be agreed prior to its format.

The complainant is not precluded from appealing outside the project/Project Secretariat GRM<sup>3</sup> if they are not satisfied with the proposed response.

### **6.4. Awareness-building**

#### **6.4.1. Information provided in an accessible format**

Information about the grievance handling system is expected to be distributed to all beneficiaries and project affected people through regular information channels used by the project, including initiating meetings at the start of the project, public consultations held on resettlement, public meetings during project implementation, brochures/pamphlets in local languages, posting on notice boards and online (including council meetings, meetings vulnerable groups, meetings with contractors and workers. Channels of dissemination through short skits, jingles)

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<sup>3</sup> An alternate dispute mechanisms such as a court of elders or to the formal legal system.

The Project Secretariat will include information provided on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints.

#### **6.4.2. Proactive advertisement/regular public information campaigns**

information campaigns will be designed by the Project Secretariat before project commencement to encourage the use of the GRM. The campaigns will use local media (e.g. TV, newspaper, radio). When organizing and conducting these campaigns, special efforts shall be made to reach vulnerable groups. The campaigns should include information on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, principle of confidentiality and right to make anonymous complaints. Information on complaints received and resolved will be reported as part of the project's routine quarterly reporting. Also, a summary of implementation of the grievance mechanism will be provided to the public on an annual basis, after removing identifying information on individuals to protect their identities.

### **6.5. Staffing and capacity-building**

#### **6.5.1. Roles and responsibilities**

The Project Secretariat will allocate responsibilities to Project Secretariat staff (unless the GRM is outsourced). These will be documented in the first Quarterly Progress Report and kept updated.

- Overall management of the GRM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording/logging of complaints
- Notification to the complainant
- Sorting/categorization of complaints
- Investigation
- Decision-making based on the investigation results
- Processing appeals
- Publishing responses to complaints
- Organization and implementation of information materials and awareness campaigns
- Budgeting of the GRM
- Reporting and feedback on GRM results

#### **6.5.2. Capacity-building**

Training for all relevant staff and relevant stakeholders will be held annually, or as otherwise agreed. New staff will receive training as a regular part of the onboarding process. The training will include all aspects of the GRM set out in this chapter. All trainings should include information on the GRM principles and procedures. The training will have an emphasis on accountability to the complainant. A key focus at the

outset will be shifting from informal complaint resolution, to the logging of all complaints/feedback into this system.

Dedicated trainings should be provided to staff directly engaging with beneficiaries, those handling the system, and those involved in the management and oversight of the system.

## **6.6. Transparency, monitoring and reporting**

### **6.6.1. Transparency**

Policies, procedures and regular updates on the GRM system, the complaints made and resolved, will be available online, as well as on local/ministerial notice boards and other permanent displays. They will be updated quarterly.

### **6.6.2. Regular internal monitoring and reporting**

The Project Secretariat will assess the functioning of the GRM and undertake spot checks during regular supervision visits. The Project Secretariat will work with M&E Specialist to:

- Ensure accurate entry of GRM data into the management information system or other system. Produce compiled reports to the format agreed with the Project Director.
- Provide a monthly/quarterly snapshot of GRM results (as set out below) including any suggestions and questions, to the project team and the management.
- Review the status of complaints to track which are not yet resolved and suggest any needed remedial action.

During annual/bi-annual general meetings, the project team shall discuss and review the effectiveness and use of the GRM and gather suggestions on how to improve it.

### **6.6.3. Reporting in quarterly and annual progress reports submitted to the Bank**

Quarterly and annual progress reports shall include a GRM section which provide updated information on the following:

- Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting etc).
- Quantitative data on the number of complaints received, the number that were relevant, and the number resolved
- Qualitative data on the type of complaints and answers provided, issues that are unresolved
- Time taken to resolve complaints
- Number of grievances resolved at the lowest level, raised to higher levels.
- Satisfaction with the action taken
- Any particular issues faced with the procedures/staffing or use
- Factors that may be affecting the use of the GRM/beneficiary feedback system
- Any corrective measures adopted

### **6.6.4. Oversight and review**

The status of the development of the GRM, the levels of use by beneficiaries/ citizens, the challenges of implementation, etc. will be discussed in semi-annual/annual portfolio meetings. The Project Secretariat will discuss with the Bank during implementation support missions any corrective measures that may be needed.

An independent review/audit of the GRM, will be conducted prior to the mid-term review to assess the effectiveness and use of the mechanism, and recommend introduce improvements as necessary.

## **7. MONITORING AND REPORTING**

### **7.1. Involvement of Stakeholders in Monitoring Activities**

The M&E activities will focus on inputs, processes, and outcomes. Given the strong alignment between the proposed project's indicators and those to be used to monitor the implementation and measure the impact of the Government's program, monitoring of these indicators will be incorporated into the MBSSE EMIS and will be tracked as part of standard monitoring under the technical supervision and support of the Directorate of Planning. A M&E officer of the Project Secretariat will work closely with the MBSSE to ensure data collection, cleaning, analysis, and reporting are completed according to the project requirements.

The MBSSE collects data annually on all schools in basic and senior secondary education through annual ASCs, including information on gender and children with disabilities. School performance and key indicators including gender and children with disabilities will be tracked through the ASC. Given the project's reliance on timely and reliable data for effective implementation, capacity building in the areas of data collection, analysis, reporting, and dissemination will be provided.

The Free project secretariat, with support from the M&E officer and social specialist, will be responsible for monitoring and compiling a number of reports as well as ensuring the effective carrying out of the ASC and other project-supported activities reliant on data. The following reports will be required throughout the project duration at established intervals: (a) annual work plan on project implementation by component and subcomponent, including stakeholder engagement plan and (b) progress reports detailing achievements under each activity, progress on each of the indicators in the Results Framework, and analysis of identified gaps and next steps (biannually). The performance of the project will be reviewed regularly, including through biannual implementation support and supervision mission led by the World Bank.

The World Bank will provide implementation support and supervision during the project implementation period. Implementation support and supervision missions will be undertaken at least every six months and will monitor and report on progress made under the project through the implementation status and results reports (ISRs). The World Bank will also review whether the project has taken necessary actions to address issues on gender, GBV and disability. An in-depth review will be undertaken at the project implementation midpoint, by June 30, 2022. A midterm review will provide an opportunity to assess overall progress in project implementation, update the Results framework as necessary, review allocation across components, reassess the risks, and propose corrective measures to ensure achievement of the PDO.

Monitoring and evaluation under the project will rely on each level of the education system—from the school level, to local levels, and the central level. The MBSSE is responsible for ensuring effective monitoring processes are adopted and that information flow is smooth reaching the relevant stakeholders on time. Steps will be taken to ensure that each feedback mechanism established under the project can provide timely data to the local-level stakeholders. The project will maintain a strong GRM given the project's reliance on community inputs for effective implementation and achievement of project outcomes. Information on the GRM will be provided in the context of SMC and school-level training. The project secretariat will ensure timely response to any grievances received.

## ANNEX 1: GRIEVANCE FORM

<b>GRIEVANCE/INQUIRY RECORD</b>				
<i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and sent to the Free Project Secretariat at the national office. Attach any supporting documentation/letters as relevant.</i>				
Date Grievance Received:			Name of Staff Completing Form:	
Grievance Received (check v): <input type="checkbox"/> National <input type="checkbox"/> District <input type="checkbox"/> Chiefdom				
Mode of Filing Inquiry or Grievance (check v): <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone Text Message <input type="checkbox"/> Website <input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other _____				
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>				
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>				
Location where grievance/problem occurred [write in]				
National:	District:	Chiefdom:	Others:	Others:
Brief Description of Grievance or Inquiry: <i>(Provide as much detail and facts as possible)</i>				
	Category 1	Safeguards, including compensation disputes, land allocation and delays in compensation		
	Category 2	Grievances regarding violations of policies, guidelines and procedures		
	Category 3	Grievances regarding contract violations		
	Category 4	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns		
	Category 5	Grievances regarding abuse of power/intervention by project or government officials		
	Category 6	Grievances regarding Free Project Secretariat staff performance		
	Category 7	Reports of force majeure		
	Category 8	Suggestions		
	Category 9	Appreciation		
Who should handle and follow up on the grievance:				
Progress in resolving the grievance (e.g., answered, being resolved, settled):				
Other Comments:				

## ANNEX 2: NOTIFICATION FORM

<b>GRIEVANCE ACKNOWLEDGEMENT</b>	
<i>Instructions: This form is to be completed by the Free Project Secretariat and mailed or delivered to the complainant.</i>	
Date Grievance Received:	Tracking Number:
Grievance Received (check <input checked="" type="checkbox"/> ): <input type="checkbox"/> National <input type="checkbox"/> District <input type="checkbox"/> Chiefdom	
Mode of Filing Inquiry or Grievance (check <input checked="" type="checkbox"/> ): <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone Text Message <input type="checkbox"/> Website <input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other _____	
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>	
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	
Contact information for the Person Raising Grievance: <i>(information is optional and confidential)</i>  Email: Phone: Address:	