

REPUBLIC OF THE GAMBIA



WEST AFRICA COASTAL AREAS (WACA) RESILIENCE INVESTMENT PROJECT 2 (WACA RESIP2) (P175525)

Stakeholder Engagement Plan (SEP)

September 2022

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Abbreviations and Acronym

AIDS	Acquired Immune Deficiency Syndrome
BCC	Banjul City Council
CBG	Central Bank Gambia
CBO	Community Based Organization
COVID-19	Coronavirus Disease 2019
DLS	Department of Lands and Surveys
DDR	Disaster Risk Reduction
DWR	Department of Water Resources
EIA	Environmental Impact Assessment
ESMF	Environmental and Social Management Framework
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
FGD	Focus Group Discussion
GBA	Greater Banjul Area
GBV	Gender Based Violence
GM	Grievance Mechanism
GoTG	The Government of The Gambia
GRC	Grievance Resolution Committee
HIV	Human Immunodeficiency Virus
IUCN	International Union for Conservation of Nature
KII	Key Informant Interview
KMC	Kanifing Municipal Council
KPI	Key Performance Indicators
LGA	Local Government Authorities
MECCNAR	Ministry of Environment, Climate Change and Natural Resources
MOFEA	Ministry of Finance and Economic Affairs
MOGCSW	Ministry of Gender, Children and Social Welfare
MOICI	Ministry of Information and Communication Infrastructure
MTIE	Ministry of Trade Industry and Employment
MTC	Ministry of Tourism and Culture
NDMA	National Disaster Management Agency
NEA	National Environment Agency
NGO	Non- Government Organization
NRA	National Roads Authority
PAD	Project Appraisal Document
PAP	Project Affected Person
PURA	Public Utilities Regulatory Authority
PDO	Project Development Objective
PIM	Project Implementation Manual

RAP	Resettlement Action Plan
ResIP	Resilience Investment Project
RPF	Resettlement Policy Framework
RSC	Regional Steering Committee
SSCT	Sexual Exploitation and Abuse/Sexual Harassment Compliance Team
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
STD	Sexually Transmitted Diseases
WDC	Ward development Committee
WACA-ResIP2	West Africa Coastal Areas (WACA) Resilience Investment Project 2WCR
WAEMU	West Africa Economic and Monetary Union
WCR	West Coast Region

GLOSSARY OF KEY TERMS

Consultation: The process of gathering information or advice from stakeholders and considering these views when making project decisions and/or setting targets and defining strategies.

Engagement: A process in which a company builds and maintains constructive and sustainable relationships with stakeholders affected over the life of a project. This is part of a broader “stakeholder engagement” strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the Project.

Grievance Mechanism: A process for receiving, evaluating, and addressing project-related complaints and guidance from citizens, stakeholders, and other affected or non-affected communities.

Stakeholders: Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively; workers, local communities directly affected by the project and other stakeholders not directly affected by the project but that have an interest in it, e.g., local authorities, neighboring projects, and/or nongovernmental organizations, etc.

Stakeholder Engagement Plan: A plan, which assists investors with effectively engaging with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.

Complainant: An individual, group, association, or organization that submits a verbal or written complaint

Grievance/Complaint: - an expression of dissatisfaction that stems from real or perceived issues, typically referring to a specific source of concern and/or seeking a specific solution. For this GM, real and perceived impacts are treated equally and given the same due process. The term grievance and complaint are used interchangeably in this document.

Sexual exploitation: any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual harassment: Any unwelcome sexual advances, request for sexual favors, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might be reasonably expected or perceived to cause offense or humiliation to another when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile, or offensive work environment.

Survivor: A survivor is a person who has experienced the SEA/SH incident in the context of this GM

Vulnerable Groups: Individuals and groups, who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, sexual orientation and gender identity, or social status may be more adversely affected by a Project than others and who may be limited in their ability to claim or take advantage of development benefits

1. INTRODUCTION/Project Description

The Government of The Gambia is seeking financial support from the World Bank to develop and implement the West Africa Coastal Areas Resilience Investment Project 2(WACA RESIP2), a regional project of which the Project Development Objective (PDO) is to ‘strengthen the resilience of targeted communities and areas in coastal Western Africa’. The Ministry of Environment, Climate Change and Natural Resources (MECCNAR) will implement the project through its Central Project Coordination Unit.

1.1 Project components for The Gambia

In The Gambia, the Project will seek to: (a) strengthen the resilience to flood risks; (b) improve the attractiveness and accessibility of the riverfront: recreational purposes, biodiversity; (c) enhance socio-economic development of area; (d) improve livability and urban environment; (e) reduce pollution from uncontrolled storm water runoff; (f) improve public health conditions; and (g) improve accessibility/connectivity avoiding traffic disruption.

The project has four (4) components as indicated below:

Component 1: Strengthen Regional integration. The objective of the regional integration component is to strengthen the effective coordination of interventions for coastal resilience in West Africa at the regional and national levels. This will be achieved through the consolidation of the regional institutional set-up and harmonization of policy, to seek economies of scale and the development of new strategic partnerships needed for the scale-up of response to the coastal resilience development challenge.

Component 2: Strengthening the policy or institutional frameworks. This component will support the strengthening of targeted institutional and policy frameworks around flood and coastal risk management, integrated flood management, integrated coastal development, natural resource management, urban resilience in The Gambia. Three areas have been identified: (a) support in mainstreaming disaster risk reduction and climate change in key sectors (e.g. Urban development), (b) strengthening institutional capacities for effective and streamlined climate change and disaster risk reduction (DRR) responses; and (c) improving the quality of hydro-meteorological services and early warning systems.

This component will also support the development of policy frameworks around transboundary coastal zone management, specifically as it relates to the use and management of shared resources along The Gambia’s borders with Senegal.

Component 3: Strengthening Physical and social investments.

Sub-component 3.1-This sub-component will finance site-specific interventions for coastal protection and/or flood control to reduce risks of flooding and/or erosion in the Greater Banjul Area (GBA), home to 25 percent of the country population and 45 percent of GDP. The project is expected to finance a mix of gray, green, and hybrid infrastructure solutions along the selected prioritized Kotu Stream hotspot to reduce risks of flooding and erosion. Green or nature-based solutions include but not limited to retention ponds/tanks/wetlands/parks, water squares/sunken plazas, (bio)swales, sidewalk planters, green roofs,

soak ways, water harvesting, green infrastructure/planting, urban gardens, submerged native aquatic vegetation, and mangrove protection to serve as a buffer to inundation and sea-level rise. Potential grey solutions include small-scale localized infrastructure such as constructing primary and secondary drainage systems and widening the Kotu Stream banks for mitigating erosion and urban flood risk and building bridges to serve as crossing point along the project site for enhancing community access, while hybrid solutions incorporate both approaches depending on site-specific needs and characteristics. Feasibility and design studies for the intervention will also be supported by this component.

Sub-component 3.2: This subcomponent will support targeted communities in area(s) of intervention to not only benefit as much as possible from the physical infrastructure and potential job opportunities for instance, but also contribute to their sustainable management (operation and maintenance). The project will also support interventions for social development and economic recovery based on the needs of affected urban and coastal communities. The project will support participatory activities (social sub-projects), which will involve working with communities on nature protection and conservation, alternative livelihoods and improvement of solid waste management to improve health conditions and reduce flooding. The eligibility and selection criteria as well as modalities would be described in the operations manual for this subcomponent.

Component 4: Project management. This component will finance project management costs including environmental and social risk management as well as monitoring and evaluation. This includes support to the Project Implementation Unit (PIU) for staffing, monitoring and evaluation, project technical audits, safeguards, financial management, procurement and training, small goods, equipment and operational costs associated with project management. It will also support (i) a National Steering Committee created to ensure coordination across relevant sectors and multi-stakeholder decision-making for key strategic project decisions and representation for The Gambia in the Regional Steering Committee and related regional initiatives; and (ii) a National Technical Committee to ensure a diversity of technical expertise is applied to relevant project documents and activities as developed by the PIU. Component 4 will also support the development of robust communication tools and plans, including a program for awareness raising and training related to the anthropogenic impacts on coastal areas, ecosystems, and climate. Communication of relevant policies and their impact on coastal communities and stakeholders will be critical for their successful implementation and enforcement.

1.2 Summary of the main project activities

The main project activities include:

a) **Technical Assistance and Capacity building:**

- Strengthen targeted institutional and policy frameworks around flood and integrated coastal risk management, integrated coastal development, natural resource management, urban resilience in The Gambia;
- Strengthening institutional capacities for effective and streamlined climate change and DRR responses; and
- Improve capacity of hydro-meteorological services and early warning systems.

- Consolidation of regional institutional set-up and harmonization of policy, and the development of new strategic partnerships needed for the scale-up of response to the coastal resilience development challenge
- Strengthening of existing national coordination mechanisms and of institutional capacity for coastal development and protection.

b) Infrastructural Development

- Small-scale localized infrastructure such as constructing primary and secondary drainage systems and widening the Kotu Stream banks for mitigating erosion and urban flood risks
- Building bridges to serve as crossing point along the project site for enhancing community access,
- Rehabilitation of floodplains by creation of retention ponds/tanks/wetlands/parks, green infrastructure/planting water squares/sunken plazas, (bio)swales, etc.

c) social subproject development and economic recovery

- Community-driven activities, which will include labor-intensive works to provide opportunities for livelihood diversification and adaptation to climate change impacts, increase adoption and effectiveness of community-led resource management schemes, and to strengthen the role and resilience of women in the management of coastal resources.

1.3 Project Intervention Zone

The project intervention zone is the Kotu stream catchment area, which is located in the Greater Banjul Area (GBA), specifically in the Kanifing Municipality Area. The stream gets its source from storm water from the surrounding area and the seasonal rainfall. The area around Kotu Stream is densely populated with an estimated population of 201,044 (2020) and a land area of 1881 hectares and it is inhabited by relatively low-income communities and with a high social flood vulnerability. The stream can be divided into two main zones namely: (i)The river mouth/downstream river section, which is an area which is non-urbanized, with wide floodplains and connects directly to the West Coast beaches tourist area. It extends from the coastal beaches to the Serrekunda/Bakoteh Bridge; ii) the upstream section, which is urbanized with limited space for floodplains and green area and where most of the population is settled. This area extends from Serrekunda/Bakoteh Bridge to the northwestern part of NemaKunku village.

Kotu stream area is prone to pluvial flooding which affects local residents and several critical public facilities such as schools and markets, power substations, and water supply facilities in the upstream section. In the stream’s estuary area fluvial flooding as well as erosion have been reported impacting on Sunset Beach Hotel along the coast. **Figure 1** below is a map of the catchment area of the Kotu Stream.

1.4 Baseline information of the Project area

Ethnic groups

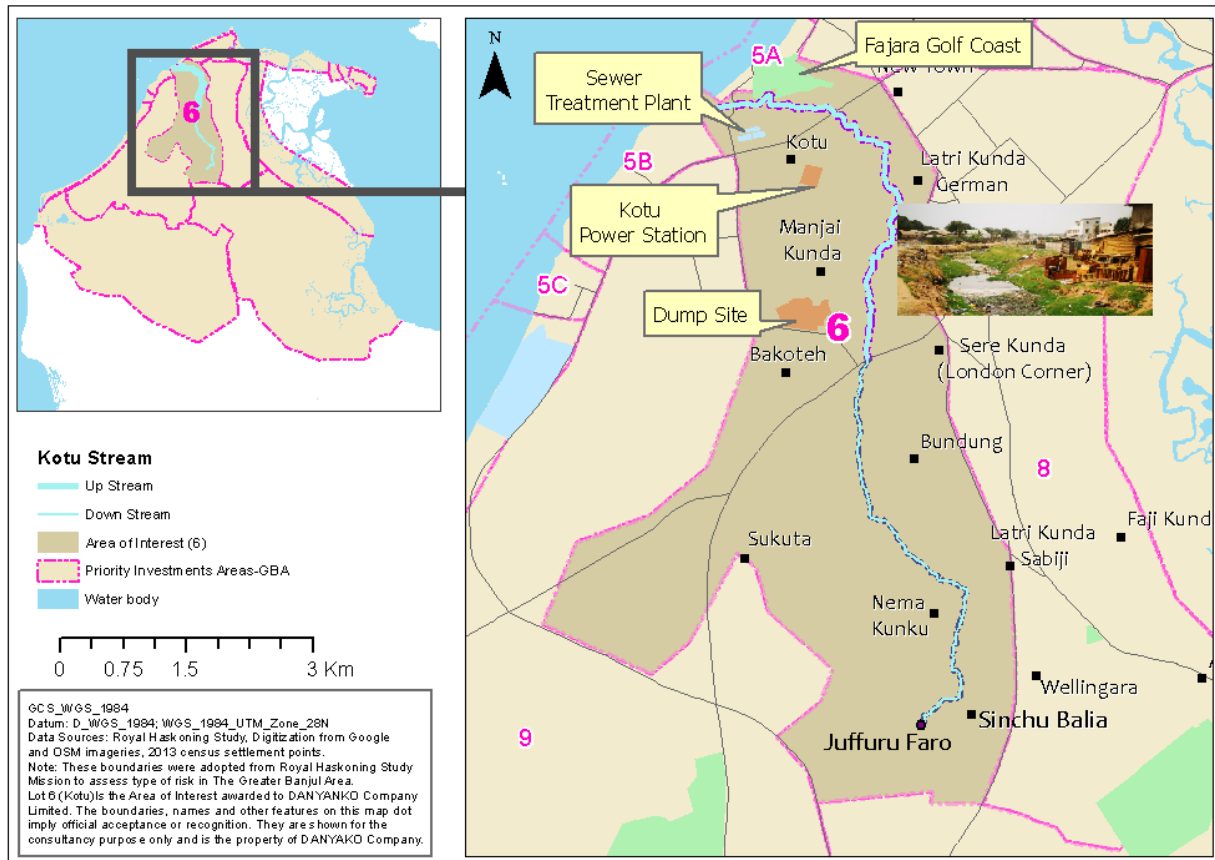
The project area is a multi-ethnic society, exhibiting a high degree of ethnic and religious diversity and tolerance. The ethnic groups include mainly the Mandingos, Fulas, Wolofs, Jolas, Sarahules, Manjagos and Akus with pockets of other tribes of less numeric significance. Although these ethnic groups are in general mixed, their concentration varies depending on the on the particular areas. Immigration from the hinterland and from the neighboring countries has resulted in inter-marriages thus paving the way for

more cultural and religious tolerance as well as promotion of peaceful co-existence. The dominant languages in the community are Mandinka and Wolof, although in the specific settlements the language of the largest ethnic group tend to dominate.

Biological Profile of the project area

The project area is an ecologically sensitive area with a mosaic of habitat types that range from coastal lagoons, mangrove swamps with fringing saltpans and grassland, which are home to many bird species. The coastline of The Gambia serves as an international flyway and serves as a stopover for all Palearctic migratory birds into Tropical Africa and coastal ecosystems such as Kotu Stream serve as important bird watching destination. The avifauna is composed of resident, inter-African and Palearctic migratory species. Egrets, Herons and Ibis are particularly well represented. For this reason, the area is regarded as an Important Bird Area (IBA), thus serving as a hotspot for ornithologists who visit The Gambia for bird watching. A more detail presentation of the biological and the socioeconomic baseline of the project area is in Annex 4.

Figure 1: Map of Kotu Stream and the catchment area (Lot 6).



Source: Denyanko Company Ltd.

1.5 Potential Environmental and Social Risks

This project will take place in a complex environmental and social setting with major risks and impacts and as a result of this complexity the project environmental and risk rating is **High**. A more detail review of these risks and impacts is provided in the project Environmental and Social Management Framework (ESMF) , which is prepared as a separate document.

The main environmental risks and impacts include:

- **Soil and water pollution**

Inadequate management or handling of wastes including hazardous substances such as used engine oil could lead to accidental spills or leaks, with potential contamination of soils, surface, and groundwater. The proximity of the Kotu Stream makes such spills particularly important because of its potential impact on the biodiversity, community and their agricultural produce and the animals that drink from the stream.

- **Air pollution**

Air quality is likely to be degraded by dust and exhaust fumes during the land preparation and construction phases. These impacts can occur either in the form of dust emissions or in the form of gaseous emissions by the construction equipment and machinery. Dust emissions can be the cause of lung infections/ respiratory health issues for site personnel, but also for people living in the vicinity of the work zones and therefore require measures to mitigate the impact.

- **Noise and vibration**

The repeated passage of construction machines/trucks and the operation of construction equipment will induce noise emissions (noise and vibrations) that are often inconvenient for the workers, animals and the people living near the work sites.

- **Loss of Vegetation and Wildlife habitats**

The land identified to be used for the construction of the contract's base camp, the main and secondary drainage and the river park may result in the loss of trees and natural habitats that can affect dependent wildlife species. Some parts of the project zone especially around the estuary are rich in wildlife especially birds.

- **Occupational Health and Safety (OHS) risks**

Since the majority of contracted workers are likely to be unskilled and untrained, there is a risk that some accidents may occur that can lead to injuries. All contractors will be required to develop and implement written labor management procedures, including procedures to establish and maintain a safe working environment as per requirements of ESS2.

- **Community health and safety**

The presence of many workers within the community and their interactions with them may increase the risk of transmission of communicable diseases, especially COVID-19, sexually transmitted diseases (STD) and sexually transmitted infections. There may also be labor influx which increases the risks of disruption of social cohesion in the community.

- **Improper waste management**

Already poor waste management is a serious health hazard and a major obstruction of the flow of Kotu Stream. The waste generated by the construction works, which will include liquid as well as solid waste (unused construction materials, packaging materials) if left abandoned around the construction sites will create negative environmental and health risks.

- **Risks of Flooding**

The area is prone to both pluvial and fluvial flooding. In the upstream section, fluvial flooding causes direct damage to infrastructure (economic damage to houses, roads, etc.). Indirect damages also occur and they consist of disruption to productive activities, employment, travel, and additional costs associated with flood management. Unplanned settlements together with dumping of waste in the stream obstruct the water flow, which have reduced the drainage capacity of the stream so that floods occur with heavy rains.

With climate change, floods have become frequent and with increased severity increased damage to property and times in the loss of life. The socioeconomic conditions of the residents and the poor infrastructure have made them very vulnerable to the impacts of climate change.

The social risks include:

- **Risk of loss of land and other assets or access to livelihood**

These risks are associated with compulsory land acquisition or restriction of land use or involuntary resettlement and may result in economic displacement or physical displacement, which could be either temporary or permanent. These risks are associated with project activities such as expanding the Kotu stream profile, the construction of primary and secondary drainage system, widening the Kotu Stream banks for mitigating erosion and urban flood risk and building bridges. Unless satisfactorily managed, the impact could lead to increased poverty, social conflict etc. for those affected. Currently, in some of the areas the banks are used for growing rice and vegetables. These issues connected with involuntary resettlement are addressed in the Resettlement Policy Framework for the Project, prepared under Environmental and Social Standard (ESS) 5

- **Risk of exclusion of vulnerable and disadvantaged groups and individuals**

This category of people such as widows with large families, women farmers who work on the banks of the stream and family heads aged over 70 years with no support are more likely to suffer from the negative effects of the project. Generally, they have limited livelihood alternatives and adaptive mechanisms in the context of high population density and they are also more likely to be excluded from the general consultation process and as a result, their concerns and priorities may not be adequately taken into account during project preparation.

- **Risks of Communicable Diseases including COVID-19, sexually transmitted diseases (STDs) and sexually transmitted infections**

The risk of spreading communicable diseases is always present irrespective of the duration of project activity and increases with the importation of workers to communities. Communicable diseases of most concern, especially during the implementation and operation phase of this project are COVID-19 especially for local community elders and persons with pre-disposed conditions and sexually transmitted diseases (STDs), which may increase in occurrence because of the influx of labor outside the community.

- **Risks of SEA/SH during the implementation phase**

Women and children are at risk of SEA/SH during the implementation and operation phase given their overall vulnerability in Gambian society partly due to custom and tradition which may be aggravated by the arrival of workers with higher earnings.

- **Risks of Accidents for project workers and community members**

In the exercise of their duties, workers engaged by the project can be involved in accidents including road traffic accidents caused by non-compliance with the rules of the road, faulty rolling stock, driver indiscipline. Similarly, members of the community may be victims because the vehicles and equipment will be operating within a densely populated areas lacking good roads.

- **Risk of Community inter- community conflict**

This may arise because of the lack of clarity on the ownership status of the land along the banks of the stream and lack of a clear demarcation of the exact land borders with many illegal settlements.¹This situation can become conflictual especially when land acquisition and compensation payments are involved.

- **Labor risks**

These risks relate to discriminatory and non-transparent recruitment of workers, particularly failure to offer employment opportunities to members of the community who may be qualified for some of the jobs on offer. This is a particularly sensitive issue as youth unemployment was raised in many of the public consultations. There are also risks relating to poor management of workers in terms of nonpayment/late payment of salaries and overtime. Finally, there are the risks of child labor. These labor risks will be addressed under the Labor Management Procedures (LMP), which are being prepared as a separate document for the project under ESS2.

2. Brief Summary of Previous Stakeholder Engagement Activities

During the preparatory phase of the project, there were extensive consultations with the different categories of stakeholders, which included government and local government officials, parastatals, community beneficiaries and NGOs.

Previous consultations undertaken helped to identify and select the project, define the project components and activities and discuss the required project preparation activities. The format of the meeting included both virtual and physical with the participation of representatives of government institutions, local government authorities² and World Bank staff

¹The Survey and Recommendations of the Kotu Stream Study: Ministry for Local Government and Lands-Department of Physical Planning and Housing, May 1995

² Min. of Finance, Min. Fisheries & Water Resources, Mini. of Transport, Works and Infrastructure, Gambia Ports Authority, National Disaster Management Agency, Min. Env. Climate Change & Nat. Res, Dept. for Strategic Policy Delivery, National Roads Authority, Kanifing Municipal Council, Banjul City Council.

From December 9 to 23, 2020 there was a World Bank mission to discuss progress in the implementation of the first phase of the Technical assistance program, the “Gambia Integrated Urban and Coastal Resilience Program” which was preparing the “Flood and Coastal Risk Assessment and Priority Investment Planning for Greater Banjul”. The Bank mission also provided training on flood risk management and coastal resilience, this built capacity of the Government to inform the selection of activities. The results of the flood risk assessment report indicated a number of hotspots at serious risk of flooding in GBA and a National Stakeholder workshop held virtually from May 4 to 5, 2021 selected Kotu Stream as the priority intervention area.

From May/June (24th May to 2 June, 2021) a virtual project preparation mission took place and discussed: (i) the overall WACA program, timeframe for project preparation, and possibility for Project preparation advance, (ii) advance the selection of project activities, (iii) discuss the institutional and implementation arrangements, (iv) advise and provide support on the preparation of the relevant safeguards documentation, fiduciary and procurement requirements, and (v) discuss potential co-financing and collaboration with other development partners. To that end, the team will conduct a series of discussions with national and local government ministries, departments, and agencies.

Between 22 to 26 November 2021, a Technical meeting of the Representatives of government institutions and local government authorities and W/Bank staff African Development Bank, (AfDB), International Union for Conservation of Nature (IUCN), West Africa Economic and Monetary Union (WAEMU). The meeting discussed infrastructure Plans, and provided training in Gender Gap Analysis, Community and Social resilience, Environmental and Social Safeguards, Policy reforms planned and the Capacity building needs.

These consultations were followed by a more detail consultations of the stakeholders as part of the project preparation activities. The consultations with the stakeholders took place between April 14 to 29, 2022 and the stakeholders consulted included members of the communities in the project zone including disadvantaged or vulnerable individuals or groups (such as women and youth), government institutions (ministries and technical departments) and non-government agencies operating in the project area.

Some of the Key issues raised during these consultations include:

- a) The community welcomed the project with high expectations of solving their long standing environmental and social problem
- b) The problem of flooding, which destroys property (houses, business etc.) and the need for government to do something
- c) Failure of authorities to ensure respect for physical planning regulations with the result that houses are built on the flood path which results in flooding of people’s homes
- d) Lack of effective waste management with the result that refuse is indiscriminately dumped everywhere including the stream and the negative impact of leakage of raw sewage into the stream
- e) Land compensation-and the need to pay compensation preferably in kind because of the scarcity of land in their areas.
- f) Generally there is a strong social capital which is reflected in the strong solidarity when floods and other forms of disaster occur
- g) Employment opportunities for the young people in the community
- h) Need to support the community to improve their livelihood, such as credit and skills training especially for the women vegetable growers and those involved in tie & dye.

A summary of the consultations with stakeholders as well as the participants at these meetings are attached as **Annex 3a and 3b respectively**.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Overall, the very purpose of stakeholder identification is to determine groups and individuals likely to be directly or indirectly affected (positively or negatively) or to have an interest in the project. In order to develop an effective plan, the identification of stakeholders takes account of the interests of the stakeholders in the project, participation needs, level of vulnerability, expectations in terms of participation and priorities of the stakeholders.

Project stakeholders are defined as individuals, groups, or other entities who:

- (i) are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
- (ii) may have an interest in the Project (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

The following sections present the different categories of stakeholders of the WACA ResIP II Project providing information on their current roles/responsibilities and their interests in the project.

3.1 Affected Parties

Affected parties include local communities and individuals working or living in Kotu stream catchment area, notably those with assets close to the stream (houses, trading stalls, and mechanical workshops), women rice and vegetable growers as shown in the table below.

Table1: Summary of Affected Stakeholders showing their roles and interest in the project

STAKEHOLDER	CURRENT ROLES/OCCUPATION	INTEREST IN THE PROJECT
Stakeholders to be directly affected adversely		
Community members living/working close to the stream	Dwelling in houses close to stream small traders, mechanics and families	The assets may be impacted by the the widening of the canal and construction of the drainage canals
Women rice and vegetable growers	Production of vegetables for sale and rice for family consumption	The land they farming on may be required by the the widening of the canal and construction of the drainage canals
Small traders	Trading in small quantities of hardware in the community	The sites of these businesses are along the banks of the stream and they may be beaffected either permanently or temporary by the proposed civil works
Mechanical Workshops (vehicles, motorcycles and bicycles)	Engaged in repairs of cycles, motor cycles and vehicles	This group may suffer temporalor permanent economic displacement if the proposed works take place intheir area.
Bird Watchers Association	Act as guides for tourists interested in bird watching in the estuary	The noise and pollution generated during the civil works may scare away the birds which result in less tourists for their area. This translates into a temporary loss of earnings for the members of the association.
Firewood and charcoal vendors	They operate from the banks of the stream because of the wider space requirements for their products	Expanding the canal and other civil works may result in permanent loss of the land they occupy and thus loss of earnings.

STAKEHOLDER	CURRENT ROLES/OCCUPATION	INTEREST IN THE PROJECT
Stakeholders to be directly affected positively		
Community members living in the Kotu stream catchment area	These are communities who are regularly affected by floods	The proposed civil works, the widening of the river profile and other green investments will reduce the risks of flooding, improved waste management, and render the place safer, healthier and more attractive
Small Traders and other businesses	These are communities that have to move regularly during floods resulting in loss of earning and sometimes destruction of goods	The project will provide interventions that minimize the floods and their impact. Improved development and attractiveness will bring more visitors and business
Contractors, suppliers, and their workers	Construction of infrastructure and supply services	Opportunities to have construction and supply contracts
Bird Water watchers Association	Act as guides for bird watching in the estuary of the Kotu stream	The proposed improvements will result in less flooding and pollution of the estuary and more attractive to birds and tourist bird watchers
Members of Fajara Golf club	Own and operate the Fajara Golf Club course	Improved drainage of the stream to help reduce flooding of parts of the golf course.
Women-led businesses	Small operators in horticulture, tie & dye, etc.	Possibility of improved and diversified livelihood through skills training and access to credit from the livelihood support component
Community chief (Alkali)	Administration of the community with the support of the elders	Support in the sensitization of the community on the project activities; act as entry points for lodging grievances/complaints at community level
Ward Development Committee	Responsible for planning and mobilizing resources for the ward development plans	Sensitization of the project activities; act as entry points for lodging grievances/complaints and mobilizing communities for community work

3.2 Interested parties

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

Table2: Summary of other interested parties showing their roles and interest in the project

STAKEHOLDER	RESPONSIBILITY	INTEREST/ROLE IN THE PROJECT
Ministry of Environment, Climate Change and Natural Resources	Responsible for policy formulation and oversight responsibility in the area of environment and climate change. Oversight of the PIU.	Overall oversight responsibility for the project. Oversee the preparation of E & S instruments providing guidance and support to the PIU during the implementation of the instruments and project implementation.
Project Implementation Unit—Central Projects Coordination Unit (CPCU),	Management of the project on a day-to-day basis	Ensure project beneficiaries access project benefits, regular monitoring of performance and support in capacity building and ensuring project affected persons (PAPs) are fully compensated for their losses

STAKEHOLDER	RESPONSIBILITY	INTEREST/ROLE IN THE PROJECT
Ministry of Finance and Economic Affairs	Responsible for managing the public finances of the Government and formulation of economic and financial policies for development	Resource mobilization for any counterpart funds including the compensation of PAPs for land and other assets negatively affected by the project
Ministry of Justice	Responsible for advising the government on judicial matters including instruments for land acquisition	Represent the Government in disputes involving compulsory land acquisition by the project
Ministry of Basic and Secondary Education	Provision of educational services at primary and secondary school levels.	Reduction of flood impacts on the school children who are sometimes absent from school due to lack of accessible roads to school and or sickness resulting from the floods
Ministry of Transport, Work and Infrastructure	Responsible for overall policy for road infrastructure	Collaborate with the project in the design of the drainages and other proposed civil works
Ministry of Women, Children and Social Welfare	Responsible for gender policy and women empowerment, poverty reduction and prevention of gender-based violence	Collaborate with the project in implementation activities to address gender inequality and risks of SEA/SH
National Roads Authority	Technical arm of the Ministry and responsible for the management of the national road network	Support the project in the technical design, for the drainage and proposed bridges. Design any future road roads to serve the new developments in these communities
The Gambia Agency for Management of Public Works (GAMWORKS)	A non-governmental, public works construction institution, that provides public infrastructure and services	Provide technical oversight support in the implementation of the civil works and support local capacity building of beneficiary communities.
Department of water Resources	Houses national hydrological and meteorological services that provide meteorological and hydrological data and information	Capacity improvement of the hydro-meteorological services to provide data/information to support the early warning flood system
National Disaster Management Agency	Responsible for national disaster risk management	Capacity development support to strengthening national disaster risk management structures
Department of Lands and Surveys	Management of the state lands and advises the government on compulsory land acquisition when the project requires land	Assist project in acquiring land and identifying a suitable land to resettle physically displaced PAPs.
The National Environment Agency	Policy formulation and coordination of environmental management	Monitor the implementation of the E & S instruments of the project
National Centre for Arts and Culture (NCAC)	Management of the Arts and Cultural Heritage of The Gambia.	Although no arts or cultural heritage was found, the Council will advise the Project in cases of chance finds
National Water and Electricity Company	Provision of utility services to the public	Support the project in extending utility services to newly developed areas such as the proposed river park
Department of Physical Planning & Housing	Responsible for overseeing the physical planning regulations including the zoning	Support the project in identifying the sites for some of the proposed infrastructural works such as the river park
Department of Forestry	Management of the nation's forest resources	Collaborate with the project for any compensatory tree planting that may be

STAKEHOLDER	RESPONSIBILITY	INTEREST/ROLE IN THE PROJECT
		required and provide support in community sensitization about the importance of trees and forests
Department of Parks and Wildlife	Management of national parks and implementation of conservation policies; promotion of bird watching activities	Collaboration with project in identifying areas of ecological interest and reduce invasive species encroachment in the canals and developed zones.
Kanifing Municipal Council	Provides municipal services to the residents in the community	Collaborate with project in the implementation of waste management programs, assistance in building resilience of communities to natural disasters, impacts of climate change and public sensitization
Brikama Area Council	Provides municipal services to the communities within their area	Collaborate with project in the implementation of waste management programs , building resilience of local communities to natural disasters and public sensitization
Telecommunication companies	Provision of telephone and other services	Support people in the project area to benefit from the different communication options such as close-user groups
Gambia Radio and Television Services	Provide nationwide coverage of news and entertainment	Broadcast information on project activities to increase awareness. This may include broadcasting press releases and special coverage.
Media -Television (Paradise TV, QTV, Eye TV etc.)	Provision of news and entertainment to the public	Inform public about project activities and any special messages released by the project
Print media	Inform the general public	Prepare and print articles to provide information to public about the project including special announcements.
Office of Regional Governor(West Coast Region)	Overall administration of the region and overseeing local administrative structures	Support the sensitizing of the public about the project and the grievance mechanism; facilitate identification of land for resettlement since there is very limited vacant land in KMC.
Community radios	Entertainment and news for the public	Convey announcements about the project to the communities within its coverage and provide a platform for communities to express their concerns and interests.
NGOs working in urban communities and supporting victims of natural disasters (Action Aid International (Gambia), ACTIVISTA)	Provision of livelihood support to communities implementation of community sensitization programs	Collaborate with project to implement some of the proposed alternative livelihood support activities, awareness raising and capacity building
Hotels -Sunset Beach Hotel & Palm Beach Hotel	Provide accommodation and hospitality to tourists	Improved management of the waste especially liquid waste and facilitating the stream's access to the sea will reduce erosion of the hotel fence at Sunset Beach Hotel and reduce air and water pollution.
West Africa Economic and Monetary Union	Promote economic integration of the member states.	Co-chair of the Regional Steering Committee-ensure global guidance and implement

STAKEHOLDER	RESPONSIBILITY	INTEREST/ROLE IN THE PROJECT
		activities related to investment framework, finance, and E&S risk management for investment, etc.
International Union for Conservation of Nature	Global authority on the status of the natural world and the measures needed to safeguard it.	Executes RISU-specific activities, and manages relationship with WAEMU

3.5 Disadvantaged and Vulnerable Groups³

Vulnerability may stem from a person’s origin, sex, gender identity, sexual orientation, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), or dependence on other individuals or natural resources, etc. Due to their status, they may not be adequately consulted about the project partly because of their inability to attend meetings or failure to understand the language that the meeting is being conducted. These and other factors combined could reduce their access to potential project benefits. This category will therefore require specific measures and/or assistance to address their vulnerability to certain risks, including SEA/SH and VAC. Within the Project, the vulnerable or disadvantaged groups will include, but are not limited to, the following:

- a) Female-headed households
- b) People living with disabilities and persons suffering from HIV/AIDS and other chronic diseases
- c) Women rice and vegetable growers
- d) Women engaged in tie & dye and other forms petty trade
- e) Informal sector workers (mechanics, firewood and charcoal vendors)
- f) Child vendors
- g) Elderly persons

To ensure adequate engagement with the vulnerable individuals and groups often requires the application of specific measures and assistance aimed at facilitating their participation in project-related decision-making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders. This is particularly important in the public awareness campaigns and the project will have to adopt a social inclusion approach using communication channels that ensure that vulnerable groups are adequately consulted and engaged in the project.

3.6 Summary of project stakeholder needs

³ Vulnerable status may stem from, among other things, an individual’s, or group’s race, national, ethnic, or social origin, color, sex, sexual orientation, gender identity, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

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

Table 3: Summary of project stakeholder needs

Stakeholder Groups	General Composition	Language requirements	Preferred means of communication (e-mail, phone, radio, letter)	Special needs (Access, meeting times etc.)
Government Ministries & Technical Depts. (implementing Partners)	Comprise advisers/experts in disaster management, finance, hydro-meteorological services, KMC, trade, gender, and youth	English	Letters, emails meetings/workshops & video conferencing	Need to have advance notice for meetings and should preferably take place during working days
Residents of Kotu Stream in both sections of the stream	Community elders, VDC members, youth, social groups, women and girls	Local Languages	Meetings, workshops, radios, social media, telephone	Need to have advance notice for meetings and preferably during weekends.
Media	Several outlets including print and electronic, (radio, newsprint and television)	English Local Languages (Mandinka, Wolof & Fula)	Mails, emails meetings & video conferencing	Need to have advance notice for meeting and should preferably take place during working hours
Small rice and vegetable growers	Women both old and young	Local languages (Mandinka, Wolof, Fula and Jola)	Meetings, Radio and WhatsApp	Need to have advance notice for meetings and preferably take place during weekends.
Bird Watchers Association and Tourist Guides	Men, taxi drivers and canoe owners	Local languages (Mandinka, Wolof & Fula) and English	Prospectus, fliers, Communication through radios and television Creation of WhatsApp group	Information in local languages through private/community radios
Disadvantaged and Vulnerable groups	Comprise women, the elderly, and persons with disabilities, persons suffering from HIV/AIDS and other chronic diseases, sex workers	Local languages (Mandinka, Wolof & Fula) And English	Prospectus, fliers, Communication through radios and television Creation of WhatsApp group	Targeting with special assistance of NGOs Information in local languages through private/community radios

Contractors and service providers	These include firms to carry out the construction works and provide supplies etc.	English and local languages (Mandinka, Wolof & Fula)	Letters, emails meetings, announcements through the media	Give wide publicity about the information through media when tenders are floated.
Regional institutions (WAEMU, IUCN, RSC	English	Letters, emails meetings/workshops & video conferencing	Need to have advance notice for meetings

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Purpose and Timing of Stakeholder Engagement Program

Stakeholder engagement is an inclusive and iterative process conducted throughout the project life cycle and enables the project to engage beneficiaries and stakeholders regularly to improve the environmental and social sustainability of projects, enhance project acceptance, and make significant contribution to successful project design and implementation.

The goals of the Stakeholder Engagement Plan (SEP) are as follows:

- Establish a systematic, inclusive, and participatory approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties
- Assess the level of stakeholder interest and support for the project and to enable their views to be considered in project design and environmental and social performance.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them, especially those who may be vulnerable or disadvantaged
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format; and,
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances, including an ethical, confidential and survivor-centered grievance mechanism to address SEA/SH complaints

Table4: Proposed strategy for consultations

Project stage	Topic of consultation / message	Method used	Timetable	Target stakeholders	Responsibilities
1. BEFORE APPRAISAL					
Project preparation and development of Project Implementation Manual (PIM)	<ul style="list-style-type: none"> • Project design • Project benefits & risks • Institutional arrangements • Identification of implementing partners • Project financing • Other donor interest in the project • Project risks and impacts 	<ul style="list-style-type: none"> -Interviews -Formal meetings -Video conference - Letters & memos 	Before appraisal	<ul style="list-style-type: none"> -MECCNAR, -M/Finance & Economic Affairs - World Bank -Ministry of Lands, DPPH -DWR; NDMA; KMC; MOTC, GAMWORKS, BAC 	Project Preparatory Team
Development of E & S documents (ESMF, ESCP, LMP, RPF & SEP)	<ul style="list-style-type: none"> • Project benefits & risks • Stakeholder consultation requirements • Gender • Vulnerable groups • GM Procedures including SEA/SH reporting procedures • Potential land requirements for project activities • Waste management 	<ul style="list-style-type: none"> • Key Informant Interviews • Focus group discussions • Meetings with women groups (women rice and vegetable growers, women workers in tie & dye) facilitated by a female facilitator 	• Before appraisal	<ul style="list-style-type: none"> • Government technical departments and Implementing Partners • Local communities • NGOs active in the community • Vulnerable groups including women and girls 	Project Preparatory Team and Consultant
Detailed Flood Risk Assessment of Kotu Stream area	<ul style="list-style-type: none"> • Review the existing flood risk assessment study for the Kotu Stream drainage basin • Refine the proposed solutions and carry out a feasibility assessment, cost benefit analysis and 	<ul style="list-style-type: none"> • Interviews • Formal meetings • Focus group discussions • Meetings with women groups (women rice and vegetable growers, women workers in tie 	• Before appraisal	<ul style="list-style-type: none"> • Government technical departments and Implementing Partners • Local communities • NGOs active in the community • Vulnerable groups including women and girls 	PIU

	<p>provide outline design of the proposed interventions.</p> <ul style="list-style-type: none"> • Carry out social and environmental safeguards analysis • Provide sufficiently detailed and accurate information to allow the Government of The Gambia to progress to the next stage of detailed design, procurement and implementation for the study area, with minimal if any addition analysis or further data collection requirements. 	& dye) facilitated by a female facilitator			
2. IMPLEMENTATION PHASE					
Sensitization of stakeholders including project beneficiaries about the E & S instruments	<ul style="list-style-type: none"> • ESMF, LMP, SEP & RPF requirements • GM procedures including SEA/SH reporting • Messages on SEA/SH Prevention and Response Action Plan • Role of the communities 	<ul style="list-style-type: none"> • Meetings • Workshops • Community/local radios • Traditional notifications including drama groups, town criers • Women only meetings in communities facilitated by a woman 	At the start of the project and throughout the implementation	<ul style="list-style-type: none"> • Local communities • Vulnerable groups including women • Ward development committees • Community elders-including Alkalos • KMC 	PIU

Information & Sensitization about ESIA & RAP Preparation and implementation	<ul style="list-style-type: none"> • ESIA, ESMP, RAP • Start date of civil work; • Impacts, mitigation measures; • SEA/SH and VAC Action Plan • Cut of date, compensation measures; • Assistance to PAP & vulnerable persons 	<ul style="list-style-type: none"> • Meetings • Workshops • Community/local radios • Traditional notifications drama groups, town criers • Separate meetings with community women in small groups facilitated by a woman 	Before the start of the civil works and throughout the implementation	<ul style="list-style-type: none"> • Government technical departments • KMC • Local communities • Vulnerable groups including women • Ward development committees • Community elders- including Alkalos • SEA/SH service providers 	PIU
During Construction	<ul style="list-style-type: none"> • ESMP requirements/risks/mitigation (including OHS) • GM Procedures including for SEA/SH reporting and record keeping • GM for workers • Codes of Conduct • Messages on accessing credit and sponsorship • Information on capacity building programs • Project land requirements • RAP development outcomes • Compensation and relocation 	Public notices Electronic publications and press releases on the M/ Tourism and project websites Focus group meetings Traditional drama groups Town/village criers Announcement by the mosque Text messages and social media Social media e.g., WhatsApp, Facebook	During implementation of the developed safeguard instruments and also works	<ul style="list-style-type: none"> • Ministry of Tourism • Project Implementation partners • World Heritage Management Committee (including NCAC and local communities who assist with managing it) • Governors in PIZ • Local Government Authorities • Contractors • Gambia Investment & Export Promotion Agency • Central Bank of The Gambia • NGOs and civil society organizations 	PIU Contractors

3. DECOMMISSIONING/PROJECT COMPLETION

	<ul style="list-style-type: none"> • Findings of the evaluation of the environmental and social performance of the project • Outstanding complaints to be resolved 	<p>Focus group meetings</p> <ul style="list-style-type: none"> -Official correspondence -Workshops - meeting with communities 	<p>At the end of project but before closure</p>	<p>Ministry of Environment, M/ Finance & Economic Affairs, Ministry of Regional Governments and Lands, KMC Beneficiary communities Relevant government agencies at national levels including women rice and vegetable growers Community leaders and WDC members</p>	<p>PIU</p>
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4.3 Proposed strategy for consultation

Consultation during COVID-19: With respect to the risks related to COVID -19, the Project will respect the World Health Organization’s (WHO) and national guidelines for preventing the spread of COVID-19. It will also take account of the World Bank’s “Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” (March 20, 2020). In line with the above guidelines, different engagement methods are proposed depending on the different needs of the stakeholders as indicated below:

- In-house consultation meetings and interviews with small groups (using masks if required)
- Administration of Mid-Term survey questionnaire
- Focus group meetings with limited number of participants
- One-on-one interviews
- Public notices (using local and national newspapers, radio, TV, billboards, mosques and churches announcements, local markets, Alkalos, and WDCs)
- Telephonic interview
- Text messages:
- Electronic publications and press releases on the TV, radio
- Ministry of Environment Climate Change and Natural Resources website outlet:
<https://www.meccnar.gov.gm>
- MECCNAR Facebook
<https://www.facebook.com>

4.4 Proposed strategy to incorporate the view of vulnerable groups

The project will carry out targeted stakeholder engagement with vulnerable groups to understand their concerns and needs in terms of accessing information on the project and other support agencies. These will include arranging special meetings with them at a more convenient place and time (not Fridays, or during time women are at the market or busy with child rearing duties) using methods and places to ensure youth and persons with disabilities are included. Similarly, women and girls, for instance, should be independently consulted in safe and enabling environments and grouped by age ranges with female facilitators leading the group discussions, especially in the case of sensitive topics such as SEA/SH risk and sex workers. It is also recommended to closely work with NGOs specialized in working with vulnerable groups so that the right approach will be taken to incorporate their views and concerns. For the physically challenged persons with visual and hearing impairment, for example this may require providing transportation to the meeting venue and having the information translated into sign language.

4.5 Reporting back to stakeholders

The Ministry Environment, Climate Change and Natural Resources through the PIU will document all program activities, and the consolidated reports will be made available to the stakeholders and the relevant authorities. The SEP will be periodically revised and updated, as necessary during project implementation, to ensure that the information presented therein is consistent and is the most recent. The review will also assess whether the identified methods of engagement remain appropriate and

effective in relation to the project context and specific phases of the development. Any major changes to project related activities will be reflected in the SEP. Monthly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible PIU staff and referred to the PIU management of the project. A sample form for collecting feedback information from stakeholders is attached as **Annex 2**. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

Information on public engagement activities undertaken by the Project during the year will be conveyed to the stakeholders in two possible ways:

- i) Publication of a standalone annual report on project's interaction with the stakeholders and meetings with stakeholders to discuss the report in VDC meetings and workshops; and
- ii) Publication of the reports on the project website, social media, TV, newspapers, PIU office etc.

4.6 Communication plan

The proposed stakeholder engagement strategy presented above will help increase awareness raising among the stakeholders particularly the most vulnerable about the project, its activities and their roles in its implementation. To ensure an effective delivery system, the project will develop a communication plan that takes account of the stakeholders' needs and preferences in terms of information. The plan will identify, on an annual basis, the communication activities to be carried out and the resource requirements to implement these activities. The project will collaborate with NGOs and CSOs in targeting and conveying messages especially among the disadvantaged and vulnerable groups. During the life of the project, annual Safeguards reports will be produced to report on how the Safeguards instruments were implemented. In addition updates will be included in the regular progress update reports.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Resources

The future environmental, social, and GBV specialists to be recruited by the PIU will be in charge of stakeholder engagement activities and the team, with the support of the NGOs and civil society organizations, will oversee the consultations with vulnerable groups (including with women).

5.2. Management functions and responsibilities for managing the Stakeholder Engagement Plan

Overall responsibility for the project will lie with the Ministry of Environment, Climate Change and Natural Resources, which will host the Project Implementation Unit that will be responsible for the day-to-day management and coordination of project activities. The environmental and social team of the PIU will be directly responsible for coordinating the implementation of the stakeholder engagement activities in collaboration with other members of the PIU.

The Ministry will recruit the following categories staff to support the PIU:

- **The communications specialist** will help develop the communication plan and support its implementation and shall liaise closely with the media
- **The Social Specialist** will be responsible for coordinating the implementation of the GM and support consultations with the beneficiary communities
- **The GBV Specialist** will be responsible for overseeing the implementation of activities relating to SEA/SH Prevention and Response Action Plan to be development in the environmental and social management framework (ESMF).
- **NGOs specializing in working with different categories of vulnerable groups** (i.e., persons with disabilities, sexual and gender minorities, women’s support services (economic development, health, etc.) to work with the PIU to ensure their active involvement in the project
- **The media** (both print and electronic as well as private or public) in close collaboration with the communication consultant and Monitoring and Evaluation Specialist will disseminate information about the project to the wider public

The stakeholder engagement activities will be documented through:

- Monthly/quarterly reports
- Ministry of Environment website, (social media including Facebook), radio (both national and local) and television
- Letters and press releases

The Stakeholder engagement plan will be incorporated in the Project Implementation Manual and the Annual Work Plan and Budget.

6. GRIEVANCE MECHANISM (GM)

The Grievance Mechanism (GM) is designed with the objective of resolving disputes at the earliest possible time before they escalate, to respond to misconduct or abuse committed by project associated staff and personnel, and for stakeholders to be able to engage the project and ask questions and raise concerns without fear of reprisals. Project-affected persons should be heard and be able to voice concerns, and as such, they must have access to fair, transparent, and accessible means to address their concerns and views related to the project.

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

Within the framework of the WACA ResIP II project in The Gambia, the grievance mechanism is based on an out-of-court complaint registration and management system. However, this mechanism provides an overview of the complaints management system that integrates environmental, social and GBV aspects. However, the grievance mechanism for project workers will be provided separately under the Labor Management Procedures prepared for this project. The grievance mechanism provided below will set out specific procedures to manage SEA/ SH complaints ethically and confidentially accompanied by an appropriate response protocol allowing access to GBV services (at minimum medical, psychosocial, and legal) through referrals.

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

6.1 Principles of GM

The GM will adopt the following six core principles to enhance its effectiveness:

- a. **Fairness:** Grievances will be treated confidentially, assessed impartially, and handled transparently.
- b. **Objectivity and independence:** The GM will operate independently of all interested parties in order to guarantee fair, objective, and impartial treatment to each case. Officers working under the GM will have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
- c. **Simplicity and accessibility:** Procedures to file grievances and seek action will be made simple enough that project beneficiaries can easily understand them. Project beneficiaries will have a range of contact options/reporting channels including, at a minimum, a telephone number, an email address, and a postal address. The design of the GM will be such that it is accessible to all stakeholders, irrespective of where they live, the language they speak. The GM will not have complex processes that create confusion or anxiety (such as only accepting grievances on official-looking standard forms or through grievance boxes in government offices). Safety

and accessibility of contact options/reporting channels will be confirmed during community consultations including the ones with women only groups facilitated by a woman.

- d. **Responsiveness and efficiency:** The GM will be designed to be responsive to the needs of all complainants. Accordingly, all officers handling grievances will be trained to take effective action upon, and respond quickly to, grievances and suggestions. Officers in charge of SEA/SH complaints will receive additional training on confidential handling of sensitive information and survivor-centered approach.
- e. **Speed and proportionality:** All grievances, simple or complex, will be addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is expected to be swift, decisive, and constructive.
- f. **Participatory and socially inclusive:** All project-affected persons – community members, members of vulnerable groups, project implementers, civil society, and the media - are encouraged to bring grievances and comments to the attention of project authorities. Special attention is given to ensure that poor and disadvantaged groups, including those with special needs, can access the GM.

6.2 Objectives of Grievance mechanism

The grievance Mechanism aims to provide an operational, fast, efficient, transparent and inclusive grievance registration and management system that allows for the prevention or resolution of grievances and conflicts through negotiation and dialogue with a view to an amicable settlement, except for SEA/ SH related grievances for which the reporting, referral and handling of grievances are governed by specific principles and procedures.

One of its main objectives is to avoid resorting to the judicial system and to seek an amicable solution in as many situations as possible (except for complaints related to GBV/SEA/ SH where an amicable solution is not recommended), thus preserving the interest of the complainants and the image of the project by limiting the risks inevitably associated with legal action. On the other hand, in the case of a complaint related to GBV/SEA/ SH, recourse to the courts is possible if the complainant wishes to pursue the matter, even as a last resort.

This mechanism is not intended to be a mandatory prerequisite, let alone to replace the legal channels for managing complaints and conflicts. However, it does ensure that concerns/complaints from stakeholders related to Project activities are promptly listened to, analyzed, addressed, and documented in order to detect causes, take corrective action, and avoid injustice or discrimination and aggravation beyond the Project's control.

The key objectives of the GM are:

- Record, categorize and prioritize the grievances according to severity and immediacy of the issue, and provide timely, fair, accountable resolution to grievances at the project level
- Ensure multiple and accessible channels for all stakeholders, especially those who are vulnerable or disadvantaged
- Settle the grievances via consultation with all stakeholders (and inform stakeholders of the solutions, obtain their views on the outcome, and ensure they understand possible next steps to escalate if they are not satisfied with the outcome)

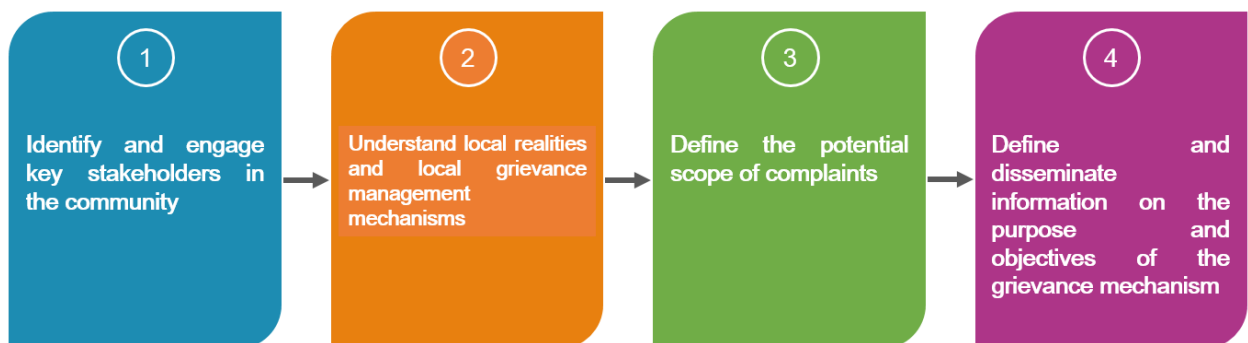
- Prevent the risks and mitigate the impacts of SEA/SH by facilitating access to GBV service, raising awareness on SEA/SH amongst workers and community and enforce sanctions against perpetrators in line with the code of conduct of the project
- Forward any unresolved cases to the relevant authority
- Regularly analyze grievances to assess if there are systemic issues in the project that should be addressed to mitigate the same types of issues being reported

The GM operates within the existing legal, cultural and community context of The Gambia. It will also take into consideration World Bank procedures and recommendations regarding complaint handling and monitoring and reporting on their resolution.

The specific nature of sexual exploitation and abuse and sexual harassment requires appropriate measures for reporting and handling these allegations safely and ethically through the complaint management mechanism. The mandate of an SEA/SH complaint management mechanism is to: (1) allow for multiple entry points confirmed as safe and accessible by women during consultations; (2) allow for connections between the victim and SEA/SH service providers, including a link to the national justice system (only with the informed consent of the person involved), (3) allow for a dedicated team to determine the likelihood that an allegation is related to the project using confidential and survivor-centered procedures.

6.3 Structure of the GM

This procedure is non-judicial and is based on local complaint management procedures that are considered effective and practical in anticipating and resolving disputes of any kind, except for SEA/HS cases.



It is essentially based on two principles: mediation and conciliation.

6.3.1 Triage of complaints and grievances

Registered complaints and grievances will first be screened by the registration officer to determine who is responsible for handling them. Complaints and grievances that can be handled at the local level will be handled at the village/community level first. Complaints that fall under the responsibility of other entities or those related to GBV/SEA/SH will be directly transmitted to the PIU, which will be responsible for

sending them to the person(s) in charge of processing them, including the service providers, in complete confidentiality. The mapping of the services authorized to take charge of possible cases of SEA/SH is a prerequisite for the PIU to work on.

On the other hand, when a traditional complaint (as opposed to an SAE/SH complaint) is minor, it can be resolved through an amicable solution (see section below). This solution can be formulated with the help of traditional authorities (village chief or "committee" and traditional or regal king) and community members at the village or sector level, or via the administrator, but does not need to go through PIU validation. However, the history of complaints should be recorded in a register that can be accessed for monitoring purposes at a later date.

The process includes the following steps:

- Verification that the complaint has been entered in the register available at the Village or sector;
- Production, if necessary, of any records considered useful to substantiate the claim;
- Analysis of the complaint to determine its content;
- Convening the complainant.

6.3.2 Registration of complaints

The PIU/WACA ResIP II Project in the Gambia will provide stakeholders with a toll-free number dedicated to the grievance mechanism. Access to this number will be free for complainants.

In addition, for each level of grievance management, the PIU will establish a grievance register (see annex). The complaint log is divided into two sheets: a "complaint" sheet and a "response" sheet. Each sheet is self-copying in triplicate. In this way, the complainant gets one copy of the complaint, one copy is sent to the WACA ResIP II Project PCU in The Gambia, and one copy remains in the register at the sector or section or village.

The existence of this register at the level of each sector and section and the conditions of access (where it is available, when one can access the agents in charge of registering complaints, etc.) will be widely disseminated to the communities living in the project intervention sites during the consultation and information sessions. The registry will be opened as soon as project activities begin in a given area. Complaints related to SEA/SH will be registered separately.

On this basis, the complainants will formulate and file their complaints with the designated entities. The complaint will be duly registered in the register specially opened for this purpose. The Chairman of the complaints management body is responsible for this register, which will also be regularly monitored by the PIU. The addressees of the complaints will send back a reasoned response to the complainants within the time limits prescribed below at the most after receipt of the complaint. This means that all contact information (reference numbers, names of members, position, telephone number, home addresses) of the various resettlement management bodies will be given to the population in anticipation of this eventuality.

Complaints from third parties can be in the form of verbal, written, emails and letters to the designated entity, and phone calls to the different levels of complaint management. The WACA ResIP II Project PIU in The Gambia must establish a system for receiving and managing complaints. The complainant should receive confirmation of receipt of the complaint and a time frame for resolution. Preferably, the timeframe for resolution of complaints should be a maximum of five (5) working days. Anonymous complaints will be filed using the same communication channels described above. Grievance boxes will also be made available to stakeholders in the complaint management mechanism. Grievance books will be submitted to the relevant district, village and sector chiefs. Below, the procedure for submitting and

resolving complaints starting at the community level is described. The procedure for submitting and resolving complaints to the various stakeholders will be described in a project manual.

In the case of complaints from illiterate people, the PIU is committed to putting in place the necessary resources to transcribe the complaints of these people in writing on the designated form. The PIU will also ensure that responses are provided to grievances from the bodies listed in section 6.3.3.

6.3.3 Complaint settlement

Out-of-court settlements will be made at the following levels: (i) local/community level; (ii) the communal level, which includes Kanifing Municipal Council//Brikama Area Council and the NGOs and complainants; and (iii) Governorate level through the Governor of the region or the sector administrator and the PIU.

The project, through the PIU, will assume the formation of the out-of-court settlement entities and the costs associated with their operation.

⇒ Treatment of complaints at the first level

The first review will be done by the Village/Community Mediation Committee within 5 working days. If it determines that the request has substance, the complainant will be provided with appropriate reparations. This committee will include at least the following persons:

- Community Delegate or Village Chief/Section "Committee" Chairman
- a representative of the/village/committee of elders
- two representatives of the people, chosen for example from the community-based organizations and women, as appropriate,
- a representative of the WACA ResIP II Project PIU, Secretary.

This committee will include two or three women with experience in gender and GBV who will be the SEA/SH gatekeepers whose main role will be to receive SEA/HS complaints and refer survivors to independent Third Parties or SEA/HS service providers. The PIU will implement a capacity building program for its stakeholders who will be responsible for ensuring that the complaints mechanism functions in accordance with the principles of fairness, transparency, efficiency, confidentiality and documentation of all complaints or feedback requests.

Complaints related to SEA/HS should not be handled at the neighborhood/village level. The role of this body, including the SEA/HS entry points, will be to refer the complainant to the independent service providers or Third Parties responsible for the care of SEA/SH survivors, with whom the Project will sign a memorandum of understanding/collaboration.

⇒ Processing of complaints at second level

If the complainant is not satisfied with the first level treatment, the complaint will then be referred to and processed by the grievance resolution committee (GRC). A GRC will be established in each sector or section concerned.

The Grievance Resolution Committee will be responsible for receiving and resolving complaints in a fair, objective, accountable, effectively, timely and accountable manner in all phases of the project lifecycle. It will deal with all grievances that have not been resolved at the local level.

The broad responsibilities of the GRC include:

- Receiving, reviewing, investigating, and keeping track of grievances not resolved at the local level
- Adjudicating grievances as needed
- Monitoring and evaluating the fulfillment of agreements achieved through the grievance mechanism.

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

- (i) The Project Coordinator, PIU or his representative;
- (ii) an NGO working in the sector;
- (iii) Kanifing Municipal Council/Brikama Area Council (depending on the where the complaint is);
- (iv) A representative of PAPs,
- (v) Representative of the Ministry of Lands and Regional Government (if the grievance is related to lands/resettlement);
- (vi) A representative from the Ministry of Gender, Children and Social Welfare
- (vii) Social development specialist in the PIU serving as the secretary to the Committee.

This committee will also include two or three women with experience in gender and GBV to serve as EAS/HS entry points. They will receive SEA/HS complaints, conduct investigations in order to establish the link with the project and make referrals to SEA/HS service providers, in accordance with the principles and procedures described in the SEA/HS Prevention and Management Response Plan.

The GRC, which may enlist any person it deems appropriate to assist in the resolution of the dispute.

The PIU will put in place a capacity building program for its stakeholders who will be responsible for ensuring that the complaint handling mechanism operates in accordance with the principles of fairness, transparency, efficiency, confidentiality and documentation of all complaints or feedback requests.

⇒ Treatment of complaints in the third instance

If the complainant is not satisfied with the processing in the second level, the third review will be made within a maximum of one week at the level of the Office of the Regional Governor, which is the hierarchical administrative authority.

The Governor may request the support of a third party in the dispute resolution process.

In any case, if the Governor does not move forward with mediation or if the reasons are complex and/or go beyond the scope of the project, the complainant may appeal to the court of first instance.

6.3.3 Legal action

Direct recourse to the courts is possible for a complainant, with or without recourse to amicable settlement and arbitration. If the complainant is not satisfied, he or she can take the matter to the magistrates court. However, this is a last resort and is not recommended for the project as it can lead to uncontrollable costs and delays.

On the other hand, if the complainant wishes to pursue a complaint related to GBV/SEA/HS, he/she can go to court, even as a last resort.

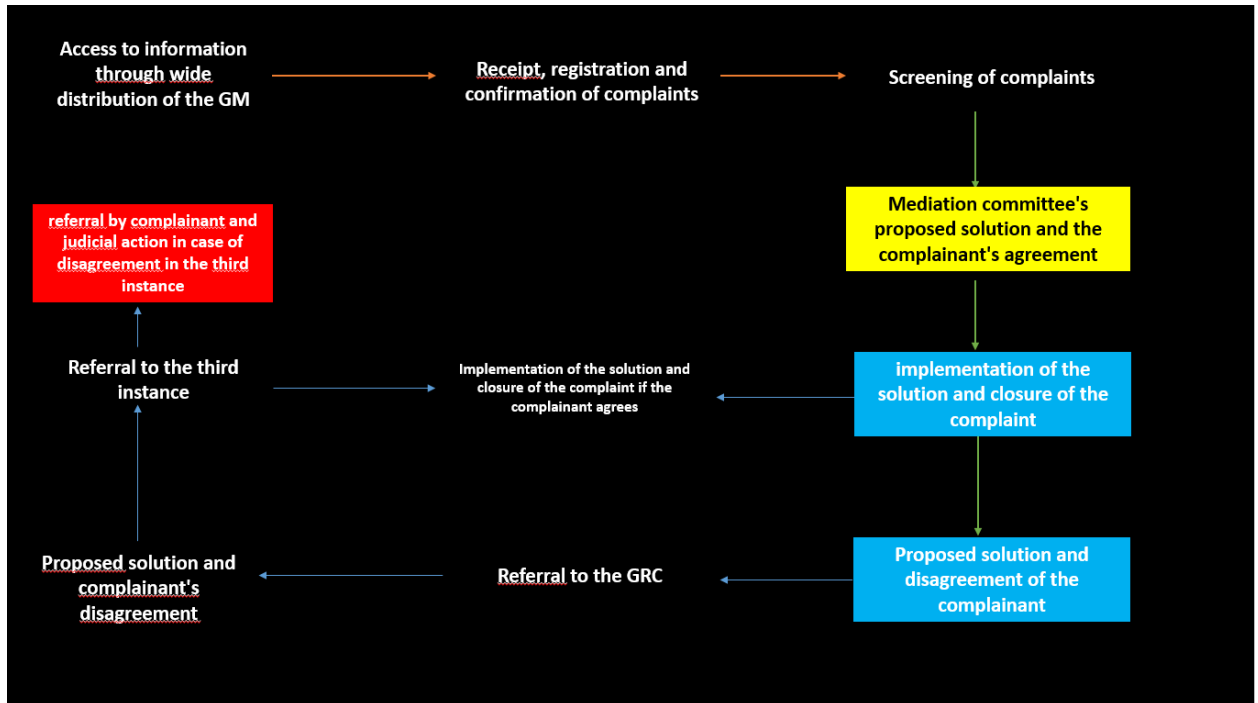
In case of legal recourse, the normal procedure in The Gambia is the following: (i) the complainant fills a complaint form at the magistrate's court in his/her area; (ii) the magistrate summons the complainant and the person (physical or legal) in question to be heard; (iv) the magistrate appoints, if necessary, a committee to assess the damage; (v) the magistrate renders his or her verdict.

6.3.5 Closing the complaint

The complaint may be recorded as closed in the dedicated log if:

- The complainant has accepted the proposed resolution (if possible in writing, using a dedicated form), and the resolution has been implemented to the satisfaction of the complainant;
- The WACA ResIP II Project PIU in The Gambia, while making every effort to resolve the issue, is unable to reach an agreement with the complainant; in this case, the complainant has the right to take legal action.

Figure 2: Complaint Management Procedure



6.3.6 Complaint processing times

For the system to be operational, it is imperative that the time limits for processing complaints are short and respected. The table below gives the indicative maximum times for processing complaints from the time they are filed to the time they are closed.

Table 5: Maximum time for processing complaints

Steps and action	Time from date of filing, in number of days
Complaint filed	0
Registration	0
Triage of complaints	5
Resolution in Village Mediation Committee	5
GRC	10
Settlement at Governorate level	15
Corrective Action	5
Monitoring of the complaint	20
Closing	30

These deadlines are given for linear processing (i.e. without appeals and referral of the file to a previous stage in the process). If these deadlines are not to be exceeded, it is possible to complete the entire process in a shorter period of time.

Once the choice of treatment has been made, the information should be sent back to the complainant. Furthermore, the complainant should be able to find out the status of the complaint at any time by consulting the committee.

VGB complaints will not be handled informally. They will be transferred to the referral system discussed in the SEA/HS response plan (separate volume). However, they will be followed up by the PIU, especially the Gender and GBV Specialist.

6.3.7 Implementation and monitoring of agreed measures

This will include ensuring that the solution and/or corrective actions are implemented and monitored.

The WACA ResIP II Project PIU in The Gambia will assume all financial costs associated with the required actions.

The WACA ResIP II Project Social Safeguard Specialist in The Gambia will be responsible for ensuring the successful implementation and monitoring of the proposed solution(s) and will report on the progress of the complaint management mechanism.

He/she will ensure that the agreed upon measures are implemented within the above-mentioned timeframe.

6.3.8 Feedback Management

During all the steps aimed at resolving the complaint, the process will be documented in the complaint follow-up sheet. In addition, feedback will be sent by email or physical mail or interactively by phone to all complainants during the entire time their complaints are being processed. In case of a solution, a formal notification will be sent to the complainant. The terms and form of the notification will need to be intellectually and culturally appropriate for the recipient.

The WACA ResIP II PCU in The Gambia will establish a physical and electronic filing system for complaints. The Complaints Administrator will be responsible for archiving complaint records (complaint form, acknowledgement of receipt, investigation reports, complaint settlement agreement, unresolved complaints, etc.).

6.3.9 Complaint tracking

In addition to the complaints database, a physical and electronic archiving system for complaints will be established (complaint form, acknowledgement of receipt, investigation reports, complaint settlement agreement, unresolved complaints, etc.). Monthly statistics on complaints will be produced by the WACA ResIP II Project's social safeguard specialist in The Gambia, taking into account the following indicators:

- the number of complaints received by type/category of reception channel during the month;
- the number of eligible complaints during the month
- the number of complaints pending at the end of the month and comparison with the last month;
- the number and percentage of complaints that resulted in a settlement;
- the number and percentage of resolved complaints;
- the number and percentage of complaints resolved within the timeframe;
- the number and percentage of complaints that were the subject of redress;
- the number of reprisals for whistleblowing;
- the number of complaints that were referred to the courts;
- the rate of GBV/SEA/HS complaints received and not resolved

6.4 Other Complementary Complaint Management Procedures

The above procedure complements the labor management procedures, for which a mechanism for managing complaints from Project workers is presented in the Labor Management Procedures document (separate volume).

As part of the work, each company will establish a GM accessible to all contracted and subcontracted workers to allow them to raise concerns in the workplace, including procedures for the ethical and confidential management of claims of exploitation and sexual abuse/harassment in the workplace. These workers will be informed of the existence of the GM and its procedures upon hire. In addition, measures will be put in place to protect them from retaliation for reporting to the PMM. The GM is designed to respond to concerns in a timely manner, using an understandable and transparent process that provides timely feedback to affected individuals in a language they understand and without compensation, and will operate in an independent and objective manner.

In terms of structure, each company's GM will be designed to allow for the proper management of direct worker complaints and anticipate labor relations risks. This GM will be established as follows:

⇒ Expressing and supporting the formalization of the grievance

The first step in the process is the registration and formalization of the complaint. For this purpose, registers will be opened at the site base and at the premises of the monitoring mission. The WACA ResIP II Project PIU in The Gambia will set up a central complaints register at the Project Management and Coordination Unit.

All complaints received will be recorded at the supervising mission level. They will then be compiled in the information management system maintained by the Environmental and Social Safeguards Specialists of the PIU of the WACA ResIP II Project in The Gambia.

This system, which will be in database format, will include the following elements:

- the reference number, date and signatory (person who registered the complaint)
- the person to whom the complaint is assigned for review and resolution
- the categorization of the complaint.

After the complaint is filed and registered, an acknowledgement of receipt is provided to the complainant as material evidence. From the date of registration in the system, the supervising mission and the PIU of the WACA ResIP II Project in The Gambia has two (02) days to acknowledge receipt of the complaint via a letter or sms to the complainant.

⇒ Analysis of the complaint

The purpose of the complaint analysis is to verify the validity and seriousness of the complaint.

For this purpose, each complaint will have to be assigned to a designated person within the following entities: the PIU, the supervision mission and the construction company.

If the resolution of the complaint is deemed to be the responsibility of the construction company, for example, a responsible person within the construction company should be clearly designated to analyze the complaint. At this point, the supervision mission will be responsible for monitoring the satisfactory resolution of the problem by the contractor in question, and this within one (01) week.

Ultimately, the work to be undertaken during this phase of analysis of the complaint, which should not exceed one (01) week from the date of receipt by itself, consists of:

- confirm the identity of the complainant by noting the information on the complainant's official identification and, if possible, taking a photograph of the person making the complaint.
- confer with the complainant to gather as much information as possible about the nature of the complaint and determine the appropriate response and approach.
- schedule a site visit, if necessary, to investigate the complaint, but ensure that the complainant and all other parties involved are present.
- document, to the extent possible, all evidence related to the complaint, including taking photographs
- determine whether the complaint is related to an area affected by Project activities. If the complaint is not related to the contractor, inform the complainant that his or her complaint is not accepted and the underlying reasons. The following actions should be taken:
 - Complete the appropriate form and send or submit a copy of the complaint form with reasons for closing the complaint,
 - Provide any documentation or evidence necessary to support this position.
 - Ensure that the complainant is informed of his/her right to present the complaint to a judicial or administrative body and/or to submit it to the local dispute resolution mechanism.

If the complaint can be resolved immediately, discuss the possible solution with the complainant and if the complainant agrees with the resolution, this step will document the solution on the complaint form and determine the date of the next site visit to resolve the complaint.

If the complainant rejects the proposed solution or no immediate solution is possible and further consultation is required, this analysis step will document this on the complaint form and have it signed by the parties.

However, the complainant will need to be provided with additional information regarding his or her rights and the proposed steps to reach a resolution of the complaint, including a time frame.

It should be noted that for each complaint whose analysis is the responsibility of the company, it is up to the supervision mission to report on the progress of its treatment during the weekly site meetings in the presence of the PIU.

A complaints analysis committee is set up to manage the grievances formulated by the workers. This committee will consist of the following entities:

- The PIU of the WACA ResIP II Project in The Gambia,
- The Supervision mission,
- The construction companies.

If it is determined that the claim has merit, the claimant shall receive and benefit from appropriate remedies. The method of appointment of members will be as follows: the various entities will formalize the appointment of their respective experts. The committee will meet, following a site visit and/or interview with the complainant. Following the meeting, a reply will be sent to the complainant, explaining the possibility of having recourse to the committee set up, in the event of dissatisfaction.

If the complainant is not satisfied with the treatment by the committee, the complainant may, if he/she wishes, appeal to the court for arbitration.

When communicating the complaint procedure, the Project will clearly communicate to individuals the different avenues available to them for the handling of their complaints.

Once the investigations are completed, the results will be communicated to the complainant and the complaint will be closed in the database if the complainant accepts the proposed settlement.

If the complainant is not satisfied with the GM's informal resolution process, he or she will be advised to take the matter to the administrative or judicial system.

MONITORING AND REPORTING

7.1 Monitoring of the implementation of the SEP

The Social and GBV Specialists in collaboration with the Environmental specialist, communication and M&E specialists will be responsible for monitoring the implementation of the SEP.

Several Key Performance Indicators (KPIs) will be monitored by the project on a regular basis, including the following:

- Number of consultation meetings and other public discussions done in line with what is outlined in this SEP
- Number of community sensitization and training on GM handling activities
- Number of community sensitization and project worker meetings on Codes of Conduct and SEA/SH-GM processes
- Number of consultations with women (in small groups facilitated by a woman) about the safety and accessibility of GM and effectiveness of SEA/SH mitigation measures
- Number of press releases published which are often broadcasted in local, regional, and national and social media channels
- Number of training programs on GM management for project affected stakeholders
- Number of grievances from staff and communities
- Number of grievances received from persons or vulnerable groups
- Number of grievances resolved within the prescribed timeline
- Percentage of complaints received regarding SEA/SH that had been referred to GBV services for medical, psychosocial and/or legal assistance.

The implementation of the SEP will be reported in the E&S quarterly report, except for sensitive cases or incidents such as SEA/SH, which should be reported immediately. The monitoring reports will highlight mobilization actions undertaken, the problems encountered, and the solutions provided to resolve them. These reports will be shared with other stakeholders, including the World Bank and will be included in the project activity report to be prepared every six months.

7.2 Involvement of stakeholders in monitoring activities

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

7. BUDGET

To ensure full implementation of the activities envisaged in this plan, the budget below has been prepared with indicative cost of the activities which comes to about USD 136,000.00 (One Hundred and Thirty-Six Thousand USD) equal to D6,800,000 (Six Million Eight Hundred Thousand Dalasi).

Table 6: Budget for the implementation of the SEP

Activity	Responsibility	Date of commencement	Cost in Dalasi	Cost in USD
Information Dissemination of the SEP	PIU	After approval of World Bank	100,000	2,000
Establishment of a platform (interactive website, Facebook pages, WhatsApp)			1,000,000	20,000
Radio & TV programs			1,500,000	30,000
Management of complaints not related to SEA/SH and VAC - Sensitization and training of management committees and office supplies	PIU	Before the start of works	250,000	5,000
SEA/SH Prevention and Response Action Plan - Training and awareness; Case management and support for psycho-social victims	PIU with support from GBV Specialist		400,000	8,000
M & E	PIU	Regularly based on the overall project reporting plan	Included in project budget	-
External evaluation of the SEP	Consultant	Mid-term and final	500,000	10,000
Total			3,750,000	75,000

Exchange rate: 1USD= GMD 50.00

8. CONCLUSION

This Stakeholder Engagement Plan was developed through a participatory approach and it sets out the principles, the process of consultation and participation of stakeholders throughout the project cycle. The plan seeks to inform all stakeholders at all the stages of project implementation through meetings, information sharing through media etc., interviews with the various actors and organizations concerned, public meetings, workshops and discussion groups on issues.

The plan is an operational and flexible document that will evolve as the Project preparation and implementation progresses taking account of the engagement and participation needs of stakeholders.

Annex1: Sample Form for recording consultations with stakeholders

Date of Consultations		
Venue of the meeting		
Topic of consultations		
	Name and Function	Organization/Community

Stakeholders Present	1.	
	2.	
	3.	
	4.	
	5.	
	6.	
	7.	
	8.	
	9.	
	10.	
Discussion points	<ul style="list-style-type: none"> • • • 	
Recommendations		

Annex 2: Sample of a Feedback form

Address of the CPCU	Date of Consultation	Venue of Consultation
Name and Status of Stakeholder	Address:	Email:
	Telephone:	
Issues Raised	Summary of the results of the consultations	
Have we left out any point or issue of concern or discussion that was raised earlier?		
Have we left out any important information?		
Is there another important stakeholder that should be consulted?		
What interests you most in the project?		
What information would you like the project to share with you? Through which channels? Do you have limitations in accessing information such as lack of access to mobile phones (including access to SMS, calling), lack of access to the internet and computers, require assistance to read/write,		

mobility issues (i.e. lack of access to transportation), disabilities, other? Do you use social media such as Facebook, other?

What are your suggestions and recommendations to improve this project? What concerns you about this project?

Annex 3a: Summary of stakeholder consultations during project identification and preparation

Date	Nature of meeting	Participants	Topics discussed
Dec.9-23, 2020	Virtual Technical mission	Representatives of government institutions and local government authorities ⁴ and W/Bank staff	T/A program on results of the flood risk assessment; second phase of the TA program ; and (iii) training on disaster monitoring
May 24-June 2 2021	Virtual Mission	Representatives of government institutions and local government authorities and W/Bank staff, African Development Bank, International Union for Conservation of Nature (IUCN), West Africa Economic and Monetary Union (WAEMU)	i) WACA program, timeframe for project preparation including institutional and implementation arrangements; potential co-financing and collaboration with other development partners.
22nd to 26th November 2021.	Technical Meeting with institutions and convening of a workshop	Representatives of government institutions and local government authorities and W/Bank staff African Development Bank, (AfDB), International Union for Conservation of Nature (IUCN), West Africa Economic and Monetary Union (WAEMU)	Infrastructure Plans, Gender Gap Analysis, Community and Social resilience, Environmental and Social Safeguards, Policy reforms planned and the Capacity building needs.
March 30 2022	Kick-off meeting	MECCNR & Consultant	Discussion on the terms of reference; potential land requirements of the project; Review and update the work plan,documentation and stakeholders.
April 6 to14 2022	Virtual meeting (2 sessions)	MECCNAR, the Consultant and W/B	-Scope of the study area; requirements of E & S documents for the project, timeline for document preparation & short presentation on the GBV-SEA/SH
April 11 2022	Nema Jufru	Welcome the project Negative impact of floods -need for proper management of waste including community sensitization -need for public health facility -Modalities of compensation for land	Project to continue sensitizing on the land acquisition and compensation. On health facility the consultant explained that this is not part of the project plans.
April 11 2022	Bundung Borehole	Negative flood impact on community Start of project Employment for youth Who will pay for the compensation of land	Consultant reconfirmed that the project is here to address these challenges. Contractors to be advised to prioritize employment opportunities to

⁴ Min. of Finance, Min. Fisheries & Water Resources, Mini. of Transport, Works and Infrastructure, Gambia Ports Authority, National Disaster Management Agency, Min. Env. Climate Change & Nat. Res, Dept. for Strategic Policy Delivery, National Roads Authority, Kanifing Municipal Council, Banjul City Council.

		Need to remove people who build their houses in the flood path and Govt. to find a better place.	locals if they fulfill the job requirements.
April 12 2022	Nema Jola kunda Only women group	Most serious problem is flooding & poverty Construction of houses on water ways is partly responsible for floods Lack of proper waste management Cases of GBV are channeled through the WDC chairman and then the police. Need to support women with credit.	The project to implement sensitization program on land acquisition to prevent animosity between those whose houses may be affected and other community members.
April 16 2022	Only women group- Manjai /Kotu	-Effects of the flood on the community -Land compensation in cases where the users are not the owners e.g. women vegetable growers -Claim they are not aware of cases of SEA in their communities -Employment opportunity for their “children”	The Consultant explained the different forms of compensation including compensation for loss of livelihood. He assured the community that the issue will be further explained to them before any land acquisition.
April 16 2022	Dippa Kunda	-Need for a good drainage canals and proper waste management -Increase number of bridges -Provide support for local women engaged in tie & dye -Cases of GBV are referred to the police -Land compensation should be in kind	The consultant re-echoed the areas of focus of the project and explained that the number of bridges is to be determined after further studies. On land compensation it was explained that compensation in kind was the first option for PAPs who lose land.
April 23 2022	Tipper Garage	-Impact of flooding on stalls of small traders -Need to consider small business (mechanics, small traders) for assistance.	Consultant informed of the special assistance for vulnerable groups (women, old people etc.)
April 26 2022	Bird Watchers Association at estuary of Kotu stream	-Project work in the area should take place during the tourism off-season to avoid scaring birds during the tourist season. -Pollution from leakage of raw sewage from the Kotu Sanitary Treatment Center operated by NAWEC -Illegal fishing of juvenile fish -Illegal settlements in the estuary	The project should consider this in planning the activity program as similar views were expressed by the hotels (Sunset Beach Hotel and Palm Beach Hotel).

Annex 3b: List of participants at the stakeholder consultations

Date	Community /Institution	No. of participants		Name of Participant	Position	Contact
		Male	Female			

14/04/22	Lamin Wayeto	6	15	Musa Senghore		7644605
				Amie Drammeh		7514923
				Monica Mendy		3540632
				Aja Fofana		2405843
				Rose Jarjou		
				MariamaSambou		
				IsatouJatta		2359379
				MariamaCeesay		9805364
				JatouSanyang		
				KaramoBojang		2244428
				Mariama Camara		7075448
				AramataMendy		2069372
				Ida Jarjou		7402775
				TaliboJammeh		7095715
				MotehSanyang		7867751
				NabaJawneh		2584488
				SirrehManneh		7318959
				Wando Ceesay		
				SambouDibba		7804176
				Alkali Touray		7902378
				Assan Camara		2474328
				Sirreh Bojang		7122870
15/04/22	Abuko Only women group	0	7	Sarjo Fatty		2343821
				BintaTunkara		7470553
				Joko Jaiteh		9290384
				Mariama Fofana		3089641
				Nyima Ceesay		7129528
				Binta Jarju		3565400
				Binta Ceesay		7177765
		13	5	Alasan Kambi	Civil Servant	9947718

15/04/22	Nema Jufur			Amadou T. Bah	Civil Servant	9906555
				Bubacarr Jallow	Imam	2469998
				Amedou Bah	Deputy Imam	7919627
				Gibril Badjie	Civil Servant	3548040
				YunusaNdow	Retired Teacher	7684303
				Isaha Sey	Business	7931908
				Sirajo Jallow	Business	9868600
				Amadou Jallow	Business	7017924
				FaburamaSaho	Business	3524120
				Ebrima Marong	Mason	
				ModouJoof	RetiredCivil Servant	7455389
				Naffie Colley	H/W	
				SoffieBojang	H/W	
				Landing Badjie	Mason	
				Momodou Bah	Business	7408088
				Fatou Darbo	H/W	
Mama Chatty	Business					
15/04/22	Nema Jola Kunda Only women group	0	12	NjaimehJobe	Participant	2235398
				Safiatou Bojang	"	7936769
				Naffie Colley	"	2700938
Date	Community /Institution	No. of participants		Name of Participant	Position	Contact
		Male	Female			
				Salieu Jan	"	7674607
				Binta Cham	"	7675673
				IsatouBojang	"	7323011
				Khadijatou Bah	"	2994634
				Kumba Joof	"	2395669
				Fatoumata Jallow	"	2390363
				Fatou Sonko	"	5167171
				BintaSuwareh	"	3322393

16/04/22	Bundung Borehole	7	8	LaminDarboe	Councillor	2241126
				AbdoulieSanyang	J.P.	7491645
				Abubacar Barrow	P.R.O WDC	7042725
				SarjoSano	Participant	2671046
				MamandinCeesay	Participant	7889905
				Modou L. Darboe	Youth Leader	7000986
				MahataSidibeh	Participant	2331139
				NyimandingJammeh	"	7789958
				FatouJammeh	"	9713750
				BintaJammeh	"	9896473
				MariamaSawaneh	"	3678808
				DoballyKanyi	"	5077094
				MusuMarong	"	2610975
				Amie Jadama	"	7784600
LaminJabbi	Beach Bar Operator	7192176				
15/04/22	Dippakunda /Tippa Garage	9	5	Ba Samba	Business	7950427
				MomodouDrammeh	Councilor	3032701
				Omar Krubally	Security Guard	7853417
				AbdoulieDrameh	Business	2265208
				Ebrima Camara	Participant	7003540
				Fatoumata Saidy	"	7876884
				Amienata Bah	"	3869507
				SaikouDrammeh	"	9993357
				BamultarrDrammeh	"	2520395
				Musa Bah	Mechanic	9414788
				IsatouJallow	Petty Trader	2152268
				Mariatou Camara	Participant	7470661
				IsatouHydara	Petty Trader	7011457
				DuwaJatta	Participant	7833736
16/04/22	Kotu/ Manjai VDC	10	6	Daniel Kanform	Secretary	7300990
				BullyTouray	Member	7840008

				Musa Tamba	Member	7063759
				Joseph P.L. Gomez	Sub. Ward Chairman	9865259
				IsatouBadjan	Member	7719812
				SarjoSanyang	Member	2129625
				AdamaBadjie	Member	7154434
				Amadou Jatta	Project Coordinator	7784203
				Omar Jarju	Member	3602140
				Fatou J. Janneh	Lady Councillor	9839817
				Amie Badjie	Participant	7173808
				NjammehBadjie	Participant	3902834
				ChernoWane	Shop keeper	2036386
				Edward Mendy	Station Officer	3950394

Date	Community /Institution	No. of participants		Name of Participant	Position	Contact
		Male	Female			
				Momodou Gomez	Alkali	7533334
19/04/22	Kotu /Manjai	0	12	FatouJatta	Participant	
				MusuJammeh	"	3343280
				IsatouBadjie	"	5236537
				KombeJoof	"	7588155
				Ma Awa Badjie	"	
				Omar Jarju	"	3602140
				SarjoSanyang	Head	2129625
				Astou Gaye	Participant	9934566
				AstouBadjen	"	7719812
				AdamaBadjie	"	7154434
				Lala Gibba	"	7550223
				MariamaSanneh	"	7016134
27/4/22		5	0	Karamba Camara	President	3177956

	Gambia Bird Watchers Association			YankubaJammeh	Secretary	7361610
				AlieuCeesay	Member	7794490
				EbrimaKorta	Member	7229474
				AnsuDunor	Asst. Secretary	7535003
				FansuBojang	Treasurer	7498571
27/04/22	Sunset Beach Hotel	1	1	HayatBlell	General Manager	28880060
				Clifford Johnson	Human Resources	79991902
27/04/22	Palm Beach Hotel	1	0	RajVakani	General Manager	2201246
GOVERNMENT AGENCIES AND NGOs						
30/03/22	MECCNAR	2	1	EbrimaJawara	Duputy PS	3807556
				Buboucarr Z. Jallow	Project Director	3053113
				JainabaFatty	M&E	3757557
14/04/22	NDMA	3	0	Babacarr Fofana	M&E	3943917
				Lamin Mass	Admin Director	9935535
				NfamaraNjie	Internal Audit	7285015
13/04/22	NAWEC	1	0	Lamin Fadera	Site EngineerSewerage	2717527
14/4/22	KMC	3	0	KemoFatajo	Manager Trade Licence	9996127
				Lamin F. Badji	Planning Dept	3481101
				Lamin S. Sanyang	Director of Services	3996542
28/04/22	MOH	2	0	Ablie Bah	Program Manager HMIS	7702237
				SajaTamba	Data Manager	7348990
21/4/22	MOBSE	1	0	AdamaJumbaJobe	DPS	7955154
28/04/22	NRA	1	0		ManagingDirector	
24/04/22	Dept. of Agriculture	1	0	PapiaMendy	Director, UrbanDirectorate	5113328
28/05/22	GAMWORKS	0	1	Elizabeth CarayolNdong	TechnicalDirector	7268097
29/04/22	AAITG	1	0	Foday Kanyi	Program head, Resilient Livelihood and Climate Justice	3513281
29/04/22	ACTIVISTA	1	0	Omar Danso	Coordinator	3732892

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24/04/22	Dept. of Agriculture	1	0	Papia Mendy	Director, Urban Directorate	5113328
28/05/22	GAMWORKS	0	1	Elizabeth Carayol Ndong	Technical Director	7268097
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29/04/22	ACTIVISTA	1	0	Omar Danso	Coordinator	3732892

Annex 4: Biological and Socioeconomic baseline information of the project area

a) Biological environment

The project area is an ecologically sensitive area with a mosaic of habitat types that range from coastal lagoons, mangrove swamps with fringing saltpans and grassland, which are home to many bird species. The coastline of The Gambia serves as an international flyway and serves as a stopover for all Palearctic migratory birds into Tropical Africa and coastal ecosystems such as Kotu Stream serve as important bird watching destination. The avifauna is composed of resident, inter-African and Palearctic migratory species. Egrets, herons and ibis are particularly well represented. For this reason, the area is regarded as an Important Bird Area (IBA), thus serving as a hotspot for ornithologists who visit The Gambia for bird watching.

The coastal vegetation of the stream is dominated by mangrove species such as *Rhizophora Harrisonii*, *Rhizophora aracemosa*, *Avicennia*. Behind the mangroves stands are inter-tidal salt marshes with an assemblage of heterogeneous halophytic species such as *Borassus aethiopum*, *Elaeis guineensis*. The non-coastal areas of the stream (Nema, Bundung and Serrekunda) do not harbor any vegetation or significant ecosystem as these areas are all occupied by human settlements.

The aquatic invertebrate fauna within the PIZ is composed predominantly of crustaceans and mollusks. Very abundant species include shrimps (*Penaeus notialis*), crabs and mangrove oysters. Fishes belonging to at least 5 families have been recorded in the area and the most abundant of these species are tilapia species, followed closely by mullets. Although the Atlantic mudskippers are also present in large numbers and are very widespread.

b) Human environment

Demography

The Gambia has a total land area of 11,295 square Kilometers with a population of 2.34 million people and 51.2 per cent or 1.2 million are women. The population in the Kanifing Municipality where the project is located is 451,420 people of which 51% is women⁵. The country has a population density of over 175 persons per square kilometer thus ranking it among the highest densely populated countries in the world. The project beneficiary communities include Latrikunda Sabiji/Nema, Bundung Borehole, Bakoteh, Tippa Garage, DippaKunda, Manjai and Kotu, which are estimated to have a population of 201,044 people.⁶

, although in the specific settlements the language of the largest ethnic group tend to dominate.

Economic activities

The main economic activities in the PIZ are:

- **Trade**- the dominant form is petty trading from corner shops that sell mainly food commodities (rice, cooking oil, etc.). Women traders operate mainly in the markets, which are sometimes located away from their neighborhoods and therefore requires them to travel daily which is a major challenge in the context of poor communication. In addition, there are roadside vendors and vendors on foot who visit homes to sell their goods. There are also skill workers such as mechanics, carpenters and electricians who operate small workshops.
- **Agriculture**-Due to limited availability of land in the project area, the scale of agricultural activity especially at the primary level of the value-chain (production) compared to other regions is relatively low. Notwithstanding, there is considerable amount of agricultural activity going on within the project area in the form of small gardens (Bundung Borehole/Sukuta) and rice farmlands mainly in the downstream where there are wide floodplains in Manjai, Kotu and along the Bertil Harding Highway and Kotu Power Station. Most of the farmers are women and the

⁵ The Gambia 2018 Statistical Abstract, GBOS

⁶ Project Appraisal Document for the West Africa Coastal Areas Investment Project 2

land they cultivate is very often borrowed which adds to their vulnerability. Crops grown are mainly vegetables and rice, the main staple food of the communities.

- **Fish Retailing**-Processing and retail marketing of fish are predominantly women activities. The women buy the fish from coastal fish landing sites at Bakau, Brufut and Tanji, and transport them to the fish market at Tippa Garage close to the Kotu stream to process and sell on retail. Because of the limited space, many of the retailers display the fish along the roadside on the ground for sale, which sometimes lead to the spoilage.
- **Handy-Craft and Tie and dye**- Handy-craft activities involving painting and pottery for flowers are done by men and mostly along the Bertil Harding Highway. The activities require great skill and therefore rewarding, given the high prices that are charged for the goods. The spaces occupied by these craftsmen do not belong to them, they are allowed a temporary use of the land until the municipality or the Government requires it. Tie and Dye activities, are mostly carried out by women in Dippa Kunda close to the stream. It is the main source of income for these women. The main risk associated with this activity is pollution of the stream and groundwater resulting from the disposal of residue of chemicals used in the processing into the stream or on the ground, which can be harmful to natural habitat.

Access to Basic Social Services

Basic Social services include the following:

- **Access to Education**

Within the KMC, there are 256 registered schools including Early Childhood Development Centers, Lower and Upper Basic and Senior Secondary Schools as at 2021. Total enrollment for all these three categories is estimated at 120,802 students of which 65,569 representing over 54% are female. Details of situation at the Basic and senior secondary schools are provided in the table below.

Table 6: Type of schools and population by gender in Kanifing Municipality

No	Type of school	Number of schools			Population		
		Public	Private	Total	Female	Male	Total
1	Nursery	0	31	31	6754	6786	13,540
2	LBS (Lower Basic)	23	103	126	33244	28706	61950
	UBS(Upper Basic)	14	38	52	13,815	10586	24401
	SSS (Senior Secondary)	13	34	47	11756	9155	20911
	TOTAL	50	206	256	65569	55233	120,802

Source: Planning Department Ministry of Basic and Secondary Education (MoBSE)

With a total land area of 75.55 sq km for KMC, the concentration of the Lower Basic, Upper Basic and Senior Secondary Schools are 1.6, 0.7 and 0.6 schools per square Kilometer respectively. This proximity is consistent with the requirements of the national education policy. However, due to increasing population in the area, the need for increase capacity at the schools is growing while land to construct schools is not available as reported by the communities of Manjai and Bundung, and confirmed by the Ministry of Basic

and Secondary Education (MoBSE) representative during the consultations. The limited capacity at the schools especially at the Upper and Senior Secondary levels has meant children from these communities are unable to continue their schooling within their communities and have to either dropout or continue elsewhere with the difficulties of transportation and transportation fares and other related costs.

- **Access to Health Services**

In the project area, there are 5 health centers, 2 of which are public and 3 private, thus providing reasonable access to the communities in terms of proximity. However, during the consultations the residents informed that access to health facilities is limited by poor road network especially during the rainy season and high transport cost. The result of this limitation is reflected in the number of cases for waterborne diseases such as diarrhea as indicated by data from selected hospitals and clinics within and around the project area provided in the table below.

Table 9: Cases of diarrhea confirmed at selected hospitals in the project area in 2021

No.	Hospital/Clinic	No of cases confirmed			
		2018	2019	2020	2021
1	Bundung Maternal Child Health Hospital	9324	7182	3572	4431
2	SinchuBaliya Village OPD	557	400	288	223
3	Wellingara Community Clinic	40	64	104	116
4	ABS Private Clinic	1058	448	208	167
TOTAL		10,979	8,094	4,172	4937

Source: Health Management Information System (HMIS) 2021

In spite of the declining pattern of the number of cases recorded over the four year period as the table suggests, the level of incidence remains a concern. Poor settlement patterns along the stream, use of unhygienic water for drinking and stagnant pools of water in some sections of the stream are all contributory factors to incidences of diarrhea and malaria.

c) Gender, Gender-Based Violence (GBV) and Gender inequality

Gender disparities in The Gambia are still significant, and the resulting constraints in education, health, income, and legal rights prevent women from participating effectively in national development. This is partly because Gambian society is still very much patriarchal, with strong traditional/cultural and religious beliefs deeply rooted across all ethnic groups some of which are highly harmful and violate the Sexual, Reproductive, Health and Rights (SRHRs) of women and girls. This has made women and girls highly vulnerable with lesser voices in decision making due to their low status in society. Key among them is sexual exploitation and sexual harassment, and other forms of sexual and domestic violence meted on

To address these challenges and reduce gender disparity, the Government formulated policies and legislations to increase opportunities for women and prevent violence against women. The policies include “Gender and Women Empowerment Policy 2010-2020” which has the “overall goal...to

mainstream gender in all national and sectoral policies, programs, plans and budgets to achieve gender, equity, equality and women empowerment in the development process.” It is important to note that the Policy has failed to address sexual harassment both in school and at workplace and it is expected that this issue will be taken up in the new Gender Policy 2023-2032, which is currently being formulated.

Specific legislation to address these conditions include the Women’s Act, 2010 which seeks to eliminate all forms of discrimination against women and the Women’s Amendment Act 2015 which specifically prohibits Female Genital Mutilation (FGM) which was absent in the 2010 Act. There is also the Sexual Offences Act, 2013, which provides protection against sexual crimes against all persons, especially vulnerable groups, including women, children and people who are mentally and physically disabled. However, while there have been some legislative gains, this still has not translated into significant outcomes to close gender gaps in a number of spheres.

d) Gender disparities in labor force

In their assigned role as the main caregivers within the home, women are particularly disadvantaged in the labor market because of the need to combine paid jobs with unpaid work such as childcare and household chores. This leaves them with fewer employment choices. Access to credit is also generally more difficult for women especially rural women who are discriminated in accessing credit because they do not own land and they cannot offer adequate security or collateral. Labor force participation in the country among women is low and reduces the growth potential of the economy. In urban labor markets where the project is located, female participation is only 37 percent compared to 70 percent for men⁷.

e) Women and land ownership

Generally, barriers exist for women in accessing land under customary title/ traditional arrangement because of cultural norms and custom. Women’s rights on land, as they relate to customary tenure, are restrictive. Whilst this does not pose any problems in State Lands (where land is owned by and administered directly by the State), it is a major obstacle with respect to customary land. The Constitution recognizes customary practices as an important basis for customary tenure thereby posing an obstacle to the legal equality of women and thus reinforcing customary practices that deny women ownership and control over land. This is reinforced by the sharia law, which is applicable to inheritance among Muslim families, and according to which the female heirs receive only half (50%) of the inherited assets compared to their male siblings. The Women’s Act, 2010 provides pre-eminence over personal religion, so female heirs are legally entitled to the same amount as their male counterparts; however, as explained above, because of the strong influence of religion and customary norms, this is not always practised.

7 Republic of The Gambia Overcoming a No -Growth Legacy Systematic Country Diagnostic,2020

Annex 5: Grievance Logbook for non-sensitive complaints (separate logbook and intake form for SEA/SH related complaints will be developed before start of project activities)

Case number	Date Claim Received	Name of Person Receiving Complaint	Where/how the complaint was received	Name & contact details of complainant (if known)	Content of the claim (include all grievances, suggestions, inquiries)	Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication and by whom)	Expected Decision Date	Decision Outcome (include names of participants and date of decision)	Was Decision communicated to complainant? Y/N If yes, state when and via what method of communication	Was the complainant satisfied with the decision? Y/N If no, explain why and if known, will pursue appeals procedure	Any follow up action?
01											
02											
03											
04											
05											
06											

