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Ministry of Finance

Public Financial Management for Service Delivery Program (PFM4SD)

**INVESTMENT PROJECT FINANCING COMPONENT OF  
THE PFM FOR SERVICE DELIVERY PROGRAM  
(P176445)**

**STAKEHOLDER ENGAGEMENT PLAN**

**April 2022**



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## LIST OF ABBREVIATIONS AND ACRONYMS

CAGD	Controller and Accountant General’s Department
CAPEX	Capital Expenditure
CPF	Country Partnership Framework
CSO	Civil Society Organization
DLI	Disbursement Linked Indicator
DOVVSU	Domestic Violence and Victims Support Unit
DP	Development Partner
EA	Environmental Assessment
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
E&S	Environmental and Social
FM	Fiduciary Management
GAS	Ghana Audit Service
GES	Ghana Education Service
GHS	Ghana Health Service
GIFMIS	Ghana Integrated Financial Management Information System
GoG	Government of Ghana
GRA	Ghana Revenue Authority
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HRMIS	Human Resources Management Information System
IAA	Internal Audit Agency
IPF	Investment Project Financing
IPSAS	International Public Sector Accounting Standards
IVA	Independent Verification Agency
MDAs	Ministries, Agencies and Departments
MESTI	Ministry of Environment, Science, Technology and Innovation
MMDAs	Metropolitan, Municipal, and District Assemblies
MoF	Ministry of Finance
MoH	Ministry of Health
MPE	Ministry of Public Enterprises
M&E	Monitoring and Evaluation
NDPC	National Development Planning Commission
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAC	Public Accounts Committee
PAI	Program Area of Influence
PCO	Program Coordination Office
PDO	Program Development Objective
PFM	Public Financial Management
PforR	Program-for-Results
PIM	Public Investment Management

PPA	Public Procurement Authority
PSC	Public Services Commission
PSP	Private sector players
RCCE	Risk Communication and Community Engagement
RRI	Rapid Results Initiative
S/DMTDP	Sector and District Medium-Term Development Plans
SEA/SH	Sexual Exploitation and Abuse/Harassment
SEP	Stakeholder Engagement Plan
SIGA	State Interests and Governance Authority
SOEs	State Owned Enterprises
TA	Technical Assistance
TSA	Treasury Single Account

## **EXECUTIVE SUMMARY**

This Stakeholder Engagement Plan (SEP) is designed to enable an effective platform for productive interaction between the Government of Ghana (GoG) and the potentially affected parties and persons with interest in the implementation and outcomes of the Investment Project Financing (IPF) component of the Public Financial Management (PFM) for Service Delivery Program (the Program). It identifies the major stakeholders affected by Technical Assistance (TA) activities proposed under the IPF component of the Program either directly or indirectly (including vulnerable and marginalized groups) as well as those with other interests that could influence decisions about these activities. It outlines the stakeholder engagement efforts carried out thus far with stakeholders, and articulates a range of strategies for timely, relevant and accessible stakeholder engagement throughout the Program implementation. The SEP is also prepared to demonstrate the GoG's commitment to best practices in Program management and compliance with the World Bank's corporate requirements on citizen and stakeholder engagement and information disclosure. While the SEP is focused on a plan of action for stakeholder engagement with respect to the Program's IPF component, it is expected to feed into the development of a broader SEP for the Program that covers all program levels.

The Program aims to improve resource mobilization and allocation, budget execution and accountability. The Program will be a five-year US\$300 million (IDA US\$150m, and GoG US\$150m) Program-for-Results (PforR), which includes an Investment Project Financing (IPF) component (Project) of US\$10 million, designed to support the Public Financial Management Reform Strategy (2022-26)/Government program.

The E&S risks and impacts of the IPF component are rated as Moderate. Potential social risks include the Ministry of Finance's and participating institutions' inadequate capacity to implement the Environmental and Social Framework (ESF) requirements; inadequate engagement with stakeholders which could lead to adverse public behavioral response to activities and internal stakeholder conflicts; inadequate engagement with vulnerable groups; and the lack of a robust Grievance Redress Mechanism (GRM). Environmental risks include health and safety issues including solid waste generation from office management and consumables during workshops and capacity building activities at the various Project Implementation Agencies; Occupational Health and Safety (OHS) concerns from travel-related accidents/incidents.

The Program will utilize various methods of engagement to ensure continuous interaction with the stakeholders. These methods will be tailored to the identified stakeholder groups. The format of every engagement activity will meet general requirements on accessibility, cultural appropriateness, and inclusiveness. Particular attention will be paid to the vulnerable groups to ensure that they are not denied Program benefits while ensuring full participation of women in the training activities.

## **1.0 INTRODUCTION**

The GoG prepared the Public Financial Management Reform Strategy (2022-2026) whose objective is to help consolidate and sustain the gains from the past PFM reforms over the last two decades and to address remaining PFM weaknesses, and in turn contribute to improved PFM outcomes for Ghana. It has five strategic pillars: 1) Strategic planning and macro-fiscal framework, 2) Budget preparation and approval, 3) Control predictability and transparency in budget execution, 4) Accounting and fiscal reporting using GIFMIS, and 5) External audit and parliamentary scrutiny. To implement the PFM Reform Strategy, the GoG is seeking the World Bank's support through a PforR financing to improve resource mobilization and allocation, budget execution and accountability for enabling better public service delivery.

The PFM for Service Delivery Program (the Program) is a PforR operation complemented by an IPF component. The Program development objective is to improve resource mobilization and allocation, budget execution and accountability. Disbursements under the Program are subject to PforR procedures and disbursed against the achievement of Disbursement Linked Indicators (DLIs); disbursements of the IPF component will follow the Bank's disbursement guidelines, and the funds will be used in line with the Financing Agreement and Bank fiduciary management (FM) procedures.

The Program is aligned with the World Bank's Country Partnership Framework (CPF) for Ghana for fiscal years (FY) 2022-26. It will build on the successes and lessons learned from the past PFM operations. Past operations have shown that positive outcomes are delivered when projects and programs are built on the Government's own strategy, have strong analytical foundation, have close coordination with sectors, and focused on a few objectives which have the greatest impact. It has also been confirmed that proliferation of small projects should be avoided, and operations should be selective with counterparts and focus on the most important institutions. Finally, it is important that prior actions and results-indicators are adequately supported by complementary Technical Assistance (TA) operations and sector operations in health, education, and energy, and the ongoing Public Sector Reforms for Results Project (P164665).

This SEP defines a program for stakeholder engagement, including public information disclosure and consultation for the IPF component, throughout the entire Program life.

## 1.1. Program Description

The Program Development Objective (PDO) is to improve resource mobilization and allocation, budget execution and accountability. The operation will be a five-year US\$300 million (IDA US\$150m, and GoG US\$150m) Program-for-Results, which includes an IPF component (Project) of US\$10 million, designed to support the Public Financial Management (PFM) Reform Strategy (2022-26)/Government program. The Program and the IPF component will be implemented nationally. The activities financed under the Program are shown below.

Development Challenge	Program Interventions	Outputs	Intermediate results	Development Outcomes
<b>Results Area 1: Improve Public Resource Mobilization</b>				
Insufficient resource mobilization	<ul style="list-style-type: none"> <li>• Use of systems and promotion of non-cash methods</li> <li>• Reach-out activities to taxpayers through citizen engagement</li> <li>• Streamlining of processes to shorten processing time</li> <li>• Improved tax systems and risk management</li> <li>• Capacity development activities for government staff</li> <li>• Negotiations with Development Partners (DPs) and configurations to the GIFMIS</li> </ul>	<ul style="list-style-type: none"> <li>- Increased number of active taxpayers</li> <li>- Increased total tax collection</li> <li>- Reduced time to file and pay tax</li> <li>- Increased proportion of tax audits based on automated risk-based selection</li> <li>- Increased proportion of donor funds on Treasury Single Account (TSA) using GIFMIS</li> </ul>	<ul style="list-style-type: none"> <li>Increased tax receipts and expanded tax net</li> <li>Taxpayer compliance facilitated</li> <li>Enhanced coordination and alignment of external finance</li> </ul>	Improved public resource mobilization
<b>Results Area 2: Improve Resource Allocation Consistent with Government Priorities</b>				
Misalignment of resource allocation with government priorities	<ul style="list-style-type: none"> <li>• Formalization of performance evaluation report template</li> <li>• Proactive actions by State Interest and Governance Authority (SIGA) to support State Owned Enterprises (SOEs) prepare financial reports</li> <li>• Improvements to fiscal projections</li> <li>• Consensus built on capital expenditure (CAPEX) allocation priorities</li> <li>• Strengthened Public Investment Management (PIM) portfolio management</li> <li>• Inter-ministerial consensus building on introduction of hard budget ceilings</li> <li>• Proactive engagements by Public Procurement Authority (PPA) to</li> </ul>	<ul style="list-style-type: none"> <li>- More performance evaluation reports submitted to Cabinet by SIGA</li> <li>- Enhanced comprehensiveness and timeline of State Ownership Reports</li> <li>- Increased allocation of CAPEX to legacy near-completion projects and new pre-appraised projects</li> <li>- Introduction of hard budget ceilings</li> <li>- Increased proportion of competitive procurement</li> <li>- National Budget with annexes on gender and climate</li> </ul>	<ul style="list-style-type: none"> <li>Reduced net subsidies/transfers to SOE sector</li> <li>Improved management of public investments</li> <li>Annual budget aligned with the development strategies and government priorities</li> </ul>	Improved resource allocation

	<p>promote increased use of competitive methods</p> <ul style="list-style-type: none"> <li>• Changes to the budget guidelines to include annexes</li> </ul>			
<b>Results Area 3: Improve Budget Execution and Accountability to Enable Better Service Delivery</b>				
Lack of access to approved budget, and inefficient management of public expenditures	<ul style="list-style-type: none"> <li>• Streamlining of budget releases process and changes to systems</li> <li>• Expansion to GIFMIS in coordination with health and education sector entities</li> <li>• Reinforced compliance with the PFM Act, 2016</li> </ul>	<ul style="list-style-type: none"> <li>- Increased proportion of payments made within 3 days of submission</li> <li>- Budget on goods and services executed through commitment control in GIFMIS increased</li> <li>- GIFMIS deepened in health and education sector</li> <li>- Increased number of internal and external audit recommendations, and Public Accounts Committee (PAC) recommendations implemented</li> </ul>	<p>Budget holders effectively and transparently implement their approved budgets</p> <p>Improved management of public expenditures</p> <p>Improved accountability and legislative oversight</p>	Improved budget execution and accountability
<b>Result Area 4: Strengthen Reforms Coordination and Stimulus for Change (Cross-cutting)</b>				

## 1.2. IPF/TA Component

The IPF component will support capacity building in PFM systems, SOEs monitoring, Human Resources Management Information System (HRMIS), change management, results verification, and program coordination. The capacity building activities will ensure quality control of interconnection solutions for PFM systems, and of training/certification modules provided by the Ministry of Finance (MoF) and implement better monitoring tools for Ghana Integrated Financial Management Information System (GIFMIS). It would also provide capacity for supervising and monitoring/evaluating SOEs and TA for climate and gender considerations in all aspects of PFM. On HRMIS, the IPF component will support development of an HR strategy and implementing a performance management system for the frontline staff. The component will finance international and local expertise providing technical guidance and support to the departments leading the targeted reforms, on change management, including but not limited to coaching on Rapid Results Initiatives (RRI) and retainment of an Independent Verification Agency (IVA). On program coordination, the component would finance the required FM, Monitoring and Evaluation (M&E), Environmental and Social (E&S) experts, and other executives and equipment to ensure adequate compliance to Bank procedures as well as support the leadership of the MoF in program

coordination. It will also support the design and implementation of the government program's complaint management mechanism, mid-term and, final evaluations of the Program (including PFM field inspections and PFM research/surveys) and a comprehensive evaluation at the end of the program. The E&S risks and impacts of the IPF component are rated as Moderate. Program Activities under the IPF/TA Component

The IPF component of the Program will support selected Technical Assistant activities in areas listed in Table 1 below:

**Table 1 Proposed TA Activities financed through IPF**

<b>Areas</b>	<b>Outline of Activities</b>
Support TA for development of and training on policies, standards, and guidelines,	Hiring a consultant to support capacity building, policy development, standards, and guidelines
Technical design of selected systems and investments on management accounting	Hiring of consultants to support capacity strengthening and training on the accounting systems including data management and software operations.
Human resources management	Strengthen capacity of human resources system and management including the use of consultants. Assessment of human resource needs and increasing HR strength through distribution and recruitment
Independent verification of results that is required for implementation of the PforR.	Hiring of consultants to conduct independent verification of results.

The E&S risks and impacts of the IPF component are rated as Moderate. Potential social risks include the MoF's and participating institutions' capacity to implement the ESF requirements; inadequate engagement with stakeholders which could lead to adverse public behavioral response to activities and internal stakeholder conflicts; inadequate engagement with vulnerable groups; and the lack of a robust GRM. Environmental risks include health and safety issues including solid

waste generation from office management and consumables during workshops and capacity building activities at the various Project Implementation Agencies; OHS concerns from travel-related accidents/incidents.

### **1.3. Objectives of Stakeholder Engagement Plan**

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation for the IPF component, throughout the entire Program life. Effective stakeholder engagement will improve the E&S sustainability of the TA activities, enhance Program acceptance, and make a significant contribution to successful IPF component design and implementation. This SEP outlines the ways in which the implementing agencies will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the IPF component activities of the Program. The subobjectives include:

- Establish a systematic approach to stakeholder engagement that will help the project identify stakeholders and build and maintain a constructive relationship;
- Identify stakeholder priorities and assess the level of stakeholder interest and support for the IPF/TA component;
- Enable stakeholders' views and feedback to be considered in project design and to achieve sound E&S performance of the IPF/TA component;
- Ensure that appropriate project information on E&S risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and culturally appropriate manner;
- 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;
- Establish formal and functional grievance/resolution mechanisms;
- Identify potential constraints and conflicts, and provide project affected people with accessible and inclusive means to raise issues and grievances; and
- Provide a monitoring and reporting mechanism for the implementation of the SEP

### **1.4. Principles for effective stakeholder engagement**

This SEP is informed by a set of principles defining its core values underpinning interactions with identified stakeholders. Common principles based on “International Best Practice” include the following:

- \* **Commitment** is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process.
- \* **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust.
- \* **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognized.
- \* **Transparency** is demonstrated when community concerns are responded to in a timely, open, and effective manner.
- \* **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- \* **Trust** is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values, and opinions.

### **1.5. Stakeholder Engagement to date**

The MoF has engaged over thirty stakeholders as part of the Program preparation process through multi-stakeholder consultations with PFM Institutions to solicit input into a proposed Program and the IPF component. Aside from these broad level engagements, consultations and interactions have been undertaken with various stakeholders (Ghana Revenue Authority (GRA), Ghana Audit Service (GAS), Internal Audit Agency (IAA), PPA, SIGA, National Development Planning Commission (NDPC), Office of Parliament, Controller and Accountant General's Department (CAGD), Civil Society Organizations (CSOs), central government agencies including Ministry of Public Enterprises (MPE), and Local Government Service) to communicate the objectives of the Ghana Public Financial Management for Service Delivery Program and to receive feedback, discuss the Environment and Social risk and impacts and to discuss potential mitigation measures. The preparation of this SEP followed the Environmental and Social Standard (ESS) 10 stakeholder consultative processes and COVID-19 prevention protocols. These engagements and consultations will continue throughout TA activity implementation. Table 2 presents the list of Stakeholders engaged and issues discussed:

**Table 2 Summary of Stakeholder Consultation during Project preparation (including SEP and ESSA preparation)**

Stakeholder Group	Institutions/Group	Topic of Consultation	Method of Engagement	Responsible Entity	Main Issues Raised
<b>Government agencies</b>	GRA, GAS, IAA, PPA, SIGA, NDPC, Office of Parliament, CAGD, MPE, MoF, Ministry of Health (MoH), GHS, MoE, GES, EPA. MESTI (Ministry of Environment, Science, Technology and Innovation), Public Services Commission (PSC)	Design of the Program including Program development objectives, scope of the PforR and IPF components, preparation timelines, costing, and budgeting, Project implementation arrangement  Program related risks including environment and social risks and impacts and potential mitigation measures	Program preparation and Technical Review Meetings through Virtual Conference (VC)/ Webex meetings and face-to-face engagement when requirement	MoF/WB	<ol style="list-style-type: none"> <li>1. Overall all the government officials engaged expressed their delight that Ghana’s PFM Reform effort is now moving into a consolidation and sustainability phase.</li> <li>2. Official from GRA were particularly excited that revenue mobilization aspects of the country’s PFM agenda will be given the needed attention it deserves.</li> <li>3. Officials from the MPE and SIGA were even much more delighted that the intended PforR Program and its IPF component have adequate interventions that intends to address the fiscal risk challenges posed by the SOEs to the overall management of the country’s macro-fiscals.</li> <li>4. Officials from NPC were of the view that the PforR Program and its IPF component has made adequate provisions to entrench planning, especially Ministries, Agencies and Departments (MDAs) / Metropolitan, Municipal, and District Assemblies (MMDs) Medium-Term Sector and District Development Plans in the country’s budgeting processes.</li> </ol>

					<p>5. Officials from MESTI and EPA were very excited that the fiscal aspects of the impact of climate change are being considered in the design of this proposed PforR Program and by its IPF componen</p> <p>6. Officials from the two main service delivery sectors – i.e., GES and GHS were of the view that the service delivery focus of this proposed PFM4SD PforR/IPF Program will contribute to the GoG’s effort in strengthening the financial management aspects of delivering services to the last mile.</p>
CSOs/ Groups/Asso ciations  / Private Sector Actors/	Penplusbytes, STAR Ghana, SEND Ghana, Ghana Integrity Initiative, Tax Justice Coalition, Peoples Dialogue, IMANI Ghana, Economic Governance Platform, Ghana Anti- corruption Coalition	Activities and environment and social risks and impacts and mitigation measures, project implementation & arrangement; COVID-19 prevention measures under the program	Discussion/ presentation/informat ion sharing	MOF/WB	The CSOs, Professional Bodies and the Private Sector players found as laudable, the GoG’s proactive approach in bringing them onboard at the early stages of the Program preparation. To them their involvement from the onset marks a significant progress in the GoG’s appreciation that nation-building is a collective endeavor that requires all hands-on deck. To this end, they expressed their unflinching commitment to be fully engaged in all aspects of the Program during its preparation, implementation, and post-implementation phase.

## **2.0 STAKEHOLDER ENGAGEMENT REGULATORY CONTEXT**

This section presents a brief overview of the national legal provisions that necessitate citizenship engagement, disclosure of public information and adequate response to queries, concerns and grievances raised by the public on key government actions. It also covers the Bank's ESF requirements on stakeholder engagement among other best practices.

### **2.1 Key National Legal Provisions for Information Disclosure, Citizen Engagement and Dispute Resolution**

#### **The 1992 Constitution**

The 1992 Constitution of Ghana acknowledges the right to information under Article 21(1) (f) as a fundamental human right of all citizens. The public will properly exercise this right if they are meaningfully engaged in the processes and procedures of public institutions.

#### **Environmental Assessment Regulations of 1999 (LI1652)**

These regulations provide the regulatory framework for the administration of Environmental Assessment (EA) in Ghana. The regulation provides for the participation of stakeholders at all levels of the Environmental Impact Assessment (EIA) process in order to ensure that their concerns and inputs are considered as part of the design, planning, project implementation and decommissioning. For instance, section 16 (1) (3) makes provision for the general public to make comments and provide suggestions on any project; section 17 (1) makes provisions for public hearing; and section 27 (1) provides the platform for complaints by aggrieved persons.

#### **Right to Information Act, 2019, (Act 989)**

This Act provides for the implementation of the constitutional right to information held by a public institution, subject to the exemptions that are necessary and consistent with the protection of the public interest in a democratic society, to foster a culture of transparency and accountability in public affairs and to provide for related matters.

#### **Data Protection Act, 2012 (Act 843)**

This Act is enacted to protect the privacy and personal data of individuals. It regulates the process personal information is acquired, kept, used or disclosed by data controllers and data processors by requiring compliance with certain data protection principles. Non-compliance with provisions

of the Act may attract either civil liability, or criminal sanctions, or both, depending on the nature of the infraction. The Act also establishes a Data Protection Commission, which is mandated to ensure compliance with its provisions, as well as maintain the Data Protection Register.

### **Alternative Dispute Resolution Act, 2010 (ACT 798)**

The Act provides for the settlement of disputes by arbitration, mediation, and customary arbitration, and establishes an Alternative Dispute Resolution Centre and to provide for related matters. This Act applies to matters other than those that relate to:

- the national or public interest.
- the environment.
- the enforcement and interpretation of the Constitution; or
- any other matter that by law cannot be settled by an alternative dispute resolution method.

## **2.2 World Bank Environmental and Social Standard on Stakeholder Engagement**

ESS10, “Stakeholder Engagement and Information Disclosure”, of the World Bank ESF recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice” (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- “Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. The process of stakeholder engagement will involve the following issues:
  - ✓ stakeholder identification and analysis;
  - ✓ planning how the engagement with stakeholders will take place;
  - ✓ disclosure of information;

- ✓ consultation with stakeholders;
  - ✓ addressing and responding to grievances; and
  - ✓ reporting to stakeholders.
- The Borrower will maintain and disclose as part of the E&S assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98).
  - A Stakeholder Engagement Plan proportionate to the nature and scale of the program and its potential risks and impacts needs to be developed by the Borrower. It must be disclosed as early as possible, and before program appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including the identification of stakeholders and the proposals for future engagement.
  - If significant changes are made to the SEP, the Borrower must disclose the updated SEP (World Bank, 2017: 99).
  - According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of program-affected parties related to the E&S performance of the program in a timely manner (World Bank, 2017: 100). For more details on the WB ESS, please follow the link below: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

### 3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

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

Cooperation and negotiation with the stakeholders throughout the Program development and implementation often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e., the individuals who have been entrusted by their fellow group members with advocating the groups’ interests in the process of engagement with the Program. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Program-related information and as a primary communication/liaison link between the Program and targeted communities and their established networks. Verification of stakeholder representatives (i.e., the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. The legitimacy of the community representatives can be verified by talking informally to a random sample of community members and soliciting their views on who can be representing their interests in the most effective way.

#### 3.1 Stakeholder Categorization

For the purposes of effective and tailored engagement, the stakeholders of the IPF component of the Program can be divided into three core categories:

**Table 3 Stakeholder Categorization**

Category	Name	Interest (their interest in the Program)
Implementing Agencies	GRA, GAS, IAA, PPA, SIGA, NDPC, Office of Parliament, CAGD, MPE, MoF, MoH,	Each of these implementing agencies would have varied interests. The interests of each of these stakeholders are considered in turn:

	<p>GHS, MoE, GES, EPA, MESTI, PSC</p>	<ol style="list-style-type: none"> <li>1. GRA’s interest would be to ensure increased domestic revenue mobilization envisaged under the Program;</li> <li>2. GAS’s interest is in ensuring that the compliance to its audit recommendation by the auditees is improved during the Program implementation.</li> <li>3. IAA’s interest is that of ensuring the internal control systems within the government departments and agencies are improved;</li> <li>4. PPA’s interest will be to ensure that the percentage of total public procurements undertaken using competitive procurement methods is increased over the Program implementation period.</li> <li>5. MPE’s and SIGA’s interest under the Program will hinge on reducing net subsidies to SOEs as well as reduce the fiscal risk posed by these SOEs to the overall fiscal risk management of the country;</li> <li>6. NDPC’s interest will lie in assisting the various MDAs and MMDAs in aligning their annual and multi-year budget preparation processes with their Sector and District Medium-Term Development Plans (S/DMTDP)</li> <li>7. Parliament of Ghana’s interest will be to ensure that government agencies accord with its legislative scrutiny and approvals to their budget and they prudently execute their budgets in accordance with the authority limits it approves for each of these institutions;</li> <li>8. The CAGD’s interest will be to improve the</li> </ol>
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		<p>financial reporting capabilities of MDA and MMDAs by increasing the extent to which those comply institutions financial statements comply with International Public Sector Accounting Standards (IPSAS);</p> <p>9. MoF’s interest is to achieve the three-overarching objective of PFM – i.e., aggregate fiscal discipline, strategic allocation of resources and efficient delivery of public services;</p> <p>10. The interest of MoH, GHS, MoE and GES as service delivery institutions is to ensure value for money in their delivery of such public services as education and health;</p> <p>11. MESTI and EPA’s interest is to ensure that the fiscal management of the country takes onboard the devastating impact of climate change and to ensure that the government is conscious of undertaking climate-relevant and climate-smart investments;</p> <p>12. PSC’s interest is to ensure the effective and efficient management of human resources of the country.</p>
<p>Affected Parties</p>	<p>Government employees.</p> <p>Citizens</p>	<p>The interest of over 600,000 employees is that of ensuring that they are effectively capacitated to contribute their quota in ensuring that the GoG’s intent to consolidate and sustain its PFM system becomes a success.</p> <p>The generality of the Ghanaian citizenry will be interested in ensuring that the GoG effectively and efficiently manage the resources of State in a way</p>

		that inures to the improvement of their wellbeing as citizens.
Vulnerable Groups	Low-income families/extreme poor and especially female headed households; Elderly; Persons with disabilities and their caregivers; People living in hard-to-reach communities; Youth; People with low or no education.	The interest of each of these vulnerable groups is to ensure that they are not left behind in the distribution of public purse.
Other interested parties	CSOs; Non-Governmental Organizations (NGOs); private sector players (PSP)	<ol style="list-style-type: none"> <li>1. CSOs' interest is that of ensuring that the PFM system of the GoG is robust in preventing such abuses of public funds as bribery, corruption, misappropriations, and many other financial infractions contained in the year-on-year report of the Auditor-General.</li> <li>2. NGOs' interest is to ensure that the PFM system of the country ensures a level playing field in their collaboration with the GoG in its delivery of public services.</li> <li>3. PSP will want to ensure that the GoG's PFM systems assist government in truly becoming an enabler of business in Ghana.</li> </ol>

**Table 4 List of Affected Stakeholders and Level of Impact**

Stakeholder Category	High Impact	Medium Impact	Low Impact
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<b>Affected Parties</b>			
Government Employees	☐		
Citizens		☐	
<b>Vulnerable Groups</b>			
Low-income families/extreme poor and especially female headed households			☐
Elderly			☐
Persons with disabilities and their caregivers			☐
People living in hard-to-reach communities			☐
Youth		☐	
People with low or no education			☐
<b>Other Interested Parties</b>			
Civil Society Organizations (CSOs)	☐		
Non-Governmental Organizations (NGOs);		☐	
private sector players (PSP)	☐		

- \* High impact: Primary/direct stakeholders (key actors and beneficiaries), having high interest, power and influence on the success of the project
- \* Medium impact: Direct/indirect stakeholders with an interest and influence on the success of the project
- \* Low impact: Secondary/indirect stakeholders who are likely to have minimal influence and less directly affected

**3.1.1 Implementing Agencies**

These include institutions and agencies that influence and make decisions on the Program implementation. They include the following:

- a. MoF
- b. MPE
- c. GRA
- d. GAS
- e. NDPC
- f. CAGD
- g. Office of Parliament
- h. SIGA
- i. PPA
- j. IAA

### **3.1.2 Affected Parties**

Persons, groups, and other entities within the Program Area of Influence (PAI) that are directly influenced (actually or potentially) by the program and/or have been identified as most susceptible to change associated with the program, and who need to be actively engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Since the TA component will be anchored in the overall Program structure, the category of stakeholders will comprise mostly government workers.

**Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the program(s) as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the program. The stakeholders in this category identified for the TA activities include:

- Low-income families/extreme poor and especially female headed households
- Elderly/ Aged
- Persons with disabilities and their caregivers
- People living in hard-to-reach communities;
- Youth;
- People with low or no education

Special efforts will be taken to disseminate program information to these groups and to ensure their inclusion in the stakeholder engagement process.

### **3.1.3 Interested Parties**

Individuals/groups/entities that may not experience direct impacts from the TA activities but who consider or perceive their interests as being affected by the TA activities and/or who could affect the TA activities and the process of its implementation in some way. This may include residents and business entities, and individual entrepreneurs in the area of the Program that can benefit from the capacity enhancement of the beneficiaries of the TA activities, Local, regional and national level CSOs, NGOs and PSPs.

The identification of interested groups is an on-going process and will continue during program implementation. The mapping and specific methods to engage these groups of people will align with the broader Program external communication strategy.

## **4.0 ENGAGEMENT METHODS AND TOOLS**

The Program will utilize various methods of engagement to ensure continuous interaction with the stakeholders. These methods will be tailored to the identified stakeholder groups. The format of every engagement activity will meet general requirements on accessibility, cultural appropriateness, and inclusiveness. Ensuring the participation of vulnerable individuals and groups in the TA consultations may require the implementation of tailored techniques.

Particular attention will be paid to the vulnerable groups to ensure that they are not denied Program benefits while ensuring full participation of women in the training activities under the TA. The SEP will be implemented throughout the Program life and will be revised when there are changes to the TA component activities to accommodate identified new stakeholders in a manner that is consistent with the ESS10 requirements.

### **Public consultation during the COVID-19 pandemic.**

Considering the outbreak of COVID-19, individuals are mandated by national directives to exercise social distancing and avoid public gatherings to prevent and reduce the risk of the virus transmission. Meanwhile, the World Health Organization has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) RCCE readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. These can be accessed at: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

The aforementioned considerations, require a review of existing approaches to stakeholder engagement and consultations. These are premised on:

- Identifying planned activities requiring stakeholder engagement and public consultations, and for which any postponement may hinder project performance.
- Assessing the level of required direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders.
- Evaluating the risks of the virus transmission for and the effect of ongoing restrictions on these engagements.

- Investigating the level of ICT penetration among key stakeholder groups, if feasible, identifying the type of communication channels that can be used effectively in the program context.

In the event where public gatherings with a representative sample of Program beneficiaries, affected peoples and other interested parties are not feasible, the Program may elect a community representative based on inputs provided by beneficiaries and a network of such representatives can be established across the target communities to determine feasible methods of wider community outreach and consultation with stakeholders. Alternate forms of messaging would be explored, and contingency plans instituted to tailor engagement when the intended tools cannot be deployed. Some of these include:

- All public gatherings, hearings, workshops, and community meetings shall be avoided until deemed safe in line with national and international advisories.
- However, small-scale focus group discussions may be arranged if permitted, with guidance around social distancing and other precautions closely adhered to.
- If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype.
- Online channels, social media platforms and chat groups will be dedicated and deployed subject to ability of all stakeholders to equitably participate in consultations.
- Traditional channels, notably television and radio broadcasting, dedicated phone-lines and mail will also be leveraged to raise awareness of Program activities amongst all user groups as needed.
- Each of the proposed channels of engagement should have specific mechanisms to solicit feedback from relevant stakeholders.
- In which case direct communication with certain affected peoples are of the essence, channels for engagement, employing a context-specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators, will be designed based on preference expressed by said beneficiaries.
- Everyone involved in stakeholder planning will be trained in positive social behaviour and hygiene practices and are required to preface every engagement session by articulating them.

## 4.1 Description of Engagement Methods

International standards increasingly emphasize the importance of a consultation being ‘free, prior and informed’, which implies an accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information. To meet best practice approaches, the Program will apply the following principles for stakeholder engagement:

**Openness and life-cycle approach:** public consultations for the Program will be continuous throughout the life cycle of the Program, and carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.

**Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns; information will be provided to women and other vulnerable groups like old age persons, disabled, children etc. in a manner accessible to them to ensure their effective participation and feedback.

**Inclusiveness and sensitivity:** stakeholder identification will be undertaken to support better communications and build effective relationships. The participation process for the Program is inclusive. All stakeholders always will be encouraged to be involved in the consultation process. Equal access to information will be provided to all stakeholders.

**Sensitivity to stakeholders’** needs is the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups, in particular women, youth, elderly, displaced persons, those with underlying health issues, persons with disabilities and the cultural sensitivities of diverse ethnic groups.

**Flexibility:** The methodology will adapt various forms of communication including internet and phone communication as may be appropriate.

A summary description of the engagement methods and techniques that will be applied by the Program is provided in Table 5.

**Table 5 Method of Engaging Stakeholders**

Method /Tools	Description and use	Contents	Dissemination Method	Target Group	Responsible Entity/ Institution
<b>Consultation/ information provision</b>					
Workshops/technical working group meetings	<ul style="list-style-type: none"> <li>• Development of policies, standards and guidelines.</li> <li>• Provide inputs to the overall capacity building design, agree on M&amp;E activities, implementation of stakeholders engagement plan and applicable cost of these activities.</li> </ul>	<ul style="list-style-type: none"> <li>• Outline for development, presentations, working sessions.</li> <li>• Printed materials/presentation of information on the TA activities. Contents are concise, clear, and easy to understand by a layperson or reader.</li> <li>• Graphics and pictorials are widely used to describe</li> </ul>	Discussions. Consultation meetings, reports. Distributed as part of consultation, meetings, and workshop awareness campaigns, discussions, and meetings with stakeholders.	All divisions All Program affected area staff, interested parties, other potential stakeholders	MoF Program Coordination Office (PCO)

		technical aspects and aid understanding.			
Visual Presentations/ workshops	Visually convey Program information particularly findings from Independent Verification Agency to relevant government agencies and other interested audiences	<ul style="list-style-type: none"> <li>Printed materials, notification of events, pictorial presentations</li> <li>Description of the Program performance against the DLIs and E&amp;S compliance status.,</li> <li>Updates on Program development.</li> </ul>	Meeting with stakeholders, meeting awareness. Presentations are widely used as part of the public engagements on the Program progress and other consultation events with other stakeholders.	All Program stakeholders	MoF-PCO
Printed Progress report	Inserts, announcements, press releases, short articles, or feature stories in the printed media – newspapers and magazines	<ul style="list-style-type: none"> <li>Notification of forthcoming public events or commencement of specific Program activities.</li> <li>General description of the Program and its</li> </ul>	Placement of paid information in local, regional, and national printed media, including those intended for general reader and	All Program affected parties All Program interested parties Other potential stakeholders	MoF-PCO

		benefits to the stakeholders.	specialized audience		
<b>Information feedback</b>					
<b>Method/tool</b>	<b>Description and use</b>	<b>Content</b>	<b>Dissemination method</b>	<b>Target group</b>	<b>Institutions responsible</b>
MoF website accompanied by a feedback mechanism	Placement of Program-related information and printed materials in dedicated/designated locations on the MoF website that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Program-related information and printed	Administrations, libraries for disclosure and public comments.	All Program affected parties All Program interested parties Other potential stakeholders	MoF-PCO
Internet/Digital Media	promote various information and updates on the overall Program	Information about Program implementation agencies and shareholders, Program	A link to the Program website should be specified on the printed	All Program stakeholders and other interested	MOF-PCO

	<p>activities and potential impact management process on MoF websites, procurement, employment / training opportunities, as well as on Program's engagement activities with the public. Website should have a built-in feature that allows viewers to leave comments or ask questions about the Program. Website should be available in English</p>	<p>development updates, employment and procurement, E&amp;S aspects</p>	<p>materials distributed to stakeholders and MDAs. Other on-line based platforms can also be used, such as web conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc. Limitation: Not all parties/stakeholders have access to the internet, especially in the remote areas and in communities.</p>	<p>parties that have access to the internet resources.</p>	
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Citizens Surveys, Interviews and Questionnaires	The use of public opinion surveys, interviews, and questionnaires to obtain stakeholder views and to complement the statutory process of public consultations during verification of achievement of DLIs.	Description of the proposed Program and related processes. Questions targeting stakeholder perception of the Program, associated impacts and benefits, concerns, and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups. Administering questionnaires as part of the household visits.	All Program stakeholders.	MoF-PCO
Program Implementation Agencies (MoF/MPE/SIGA/ IAA/ GAS/GRA/NDPC/PPA Parliament/CAGD)	Program's designated venue for depositing Program-related information that also offers open hours to the stakeholders and other members of the public, with Program staff	Program-related materials. Any issues that are of interest or concern to the Institutions and other stakeholders.	Information about the info Centre or a field office with open hours for the public, together with contact details, is provided on the Program's printed materials distributed to	All Program affected parties Program interests' parties Other potential stakeholders	MoF-PCO

	available to respond to queries or provide clarifications		stakeholders, as well as during public meetings and specified visits/ inspections.		
Non state actors, Traditional / Community leaders/ CSOs	Develop and secure clearance processes for timely dissemination of Program messages and materials in local languages and in English, where relevant, for timely dissemination of messages and materials and adopt relevant communication channels	Program related information, Sexual Exploitation and Abuse/Harassment (SEA/SH) prohibition messages, Program adverse impacts, benefits, and available feedback channels	Community outreach / town criers, dedicated Toll-free telephone lines, fliers and town hall meeting adhering to state applicable COVID 19 protocol.	All Program affected parties Program interested parties Other potential stakeholders	MoF-PCO

To further mitigate the risks associated with vulnerable groups, the following actions will be taken:

- Coordinate with the Ministry of Gender, Children and Social Protection and its departments and agencies who are responsible for the development and protection of women, children, elderly and persons with disability in Program/IPF planning and implementation
- Conduct consultations with representatives of vulnerable groups in Ghana (e.g., women's groups and persons with disability), to seek their feedback and accordingly design and suggest engagement mechanisms and frequencies, customized to their needs
- Focus group discussions dedicated to vulnerable groups may be envisaged as appropriate throughout Program/IPF life cycle

## **4.2 Information Disclosure Methods**

This SEP will be reviewed regularly and will be made available at venues and locations convenient for the stakeholders and places to which beneficiaries and other interest groups have unhindered access.

Free printed copies of the SEP in English will be made accessible for the general public at the following locations:

- MoF
- MPE
- GRA
- GAS
- CAGD
- NDPC
- IAA
- Office of Parliament
- SIGA
- PPA

Electronic copies of the SEP will be placed on the website of the Bank and at each implementing agency. This will allow stakeholders with access to internet to view information about the planned development and to initiate their involvement in the public consultation process.

The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials. The mechanisms which will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of disclosed materials to local, regional, and national NGOs, relevant professional bodies as well as other interested parties.

### **4.2.1 Timetable for Disclosure**

The disclosure process associated with the release of IPF Environment and social documentation, as well as the accompanying SEP will be implemented within the following timeframe:

- Placement of the SEP in public domain through publication on the websites prior to approval of the Program and periodically throughout Program implementation.
- Public consultation meetings with Program stakeholders to discuss feedback and perceptions about the Program before finalizing the Program documents.
- Addressing stakeholder feedback received on the entire disclosure package prior to approval of the Program.
- Disclosure of Program information periodically throughout the implementation period.

## **5.0 GRIEVANCE REDRESS MECHANISM**

The main objective of a GRM is to resolve program related complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective, and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the preparation and implementation of TA activities.
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

### **5.1. Description of GRM**

The MoF and GIFMIS Helpdesk system have a robust complaint redress system to receive and resolve service-related complaints, which will be used and further developed for TA activities of the IPF component.

The MoF/GIFMIS Helpdesk call centers nationwide will be used by citizens to lodge complaints and seek information or feedback. Other update channels include:

- E-mail
- Letter to Grievance focal points at the offices of Implementing agencies
- Walk-ins to register a complaint on a grievance logbook at Institutions or suggestion box at the offices of Stakeholder Institutions.

The government has other measures in place to handle sensitive and confidential complaints, including those related to SEA/SH in line with the WB ESF Good Practice Note on SEA/SH. The Ministry of Gender, Children and Social Protection is operating a platform dubbed 3-2-1 Platform to create awareness about gender-based violence, stigma, and mental health issues in particular, COVID-19 related impacts and to provide confidential support to complainants in collaboration

with the Domestic Violence and Victims Support Unit (DOVVSU) of the Ghana Police Service. The MoF will leverage support on the existing redress structures to address Program related complaints and support to SEA/SH complaints that may be reported during the Program implementation.

Table 6 presents the recommended grievance resolution procedure, including resolution steps, responsibilities, and time frames for addressing grievances received related to TA activities.

**Table 6 Proposed Grievance Resolution Procedure**

<b>Step</b>	<b>Process</b>	<b>Responsibility</b>	<b>Timeframe</b>
Step 1: Uptake	A mechanism put in place for Project stakeholders to submit grievances through Helpdesk call centers, email, letter or walk-ins at the MoF	Grievance Administrator, MoF	Throughout Program period
Step 2: Sorting and processing	Complaints will be compiled and recorded in a register	Grievance Administrator, MoF	Within 15 days
Step 3: Acknowledgement and follow-up	Complainant will be provided an acknowledgement of grievance receipt, including information on the likely course of action and the anticipated timeframe	Grievance Administrator, MoF	Within 5 days

	for resolution of the complaint		
Step 4: Verification, investigation, and action	Information about the grievance will be gathered to determine the facts surrounding the issue, verify the complaint's validity, and develop a proposed resolution (most grievances are expected to be resolved at this stage); if the grievance remains open, complainant will be given opportunity to appeal to the relevant institutions who will follow up with the complaints	MoF  If complainant is not satisfied with resolution, Head of Civil Service; Office of the Heads of Civil Service; the Commissioner, PSC; or the Director, the New Charter Office	Within 21 days
Step 5: Monitoring and evaluation	The grievance resolution process will be tracked and reported by maintaining a grievance register which records all steps taken to resolve grievances or	MoF	Throughout Program period

	otherwise respond to feedback and questions.		
Step 6: Providing Feedback	Complainant will be informed about the resolution and how issues were resolved, or provided answers to questions	MoF	Within 30 days

If the complaint is not resolved, an appeal can be made to the Commissioner, the Commission on Human Rights and Administrative Justice. Once all possible redress has been proposed and if the complainant is still not satisfied complainants have the right to legal recourse at their own discretion.

Data on grievances and/or original grievance logs will be made available to World Bank missions on request, and summaries of grievances and resolutions will be included in periodic reports to the World Bank.

Suggested information to include in grievance logs include:

- Individual reference number
- Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously)
- Details of the complaint, feedback, or question/her location and details of his / her complaint
- Date of the complaint
- Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.)
- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution

- Date when proposed resolution was communicated to the complainant (unless anonymous)
- Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution
- Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out

## **5.2 World Bank Grievance Redress System**

Communities and individuals who believe that they are adversely affected by a Program supported by the World Bank may also complain directly to the Bank through the Bank's Grievance Redress Service (GRS) (<https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>). A complaint may be submitted in English, or in local languages, although additional processing time will be needed for complaints that are not in English. A complaint can be submitted to the Bank GRS through the following channels:

By email: [grievances@worldbank.org](mailto:grievances@worldbank.org)

By fax: +1.202.614.7313

By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA

Through the World Bank Ghana Country Office in Accra.

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank supported program. This should be supported by available documentation and correspondence to the extent possible.

The complainant may also indicate the desired outcome of the complaint. Finally, the complaint should identify the complainant(s) or assigned representatives and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to program-related concerns.

In addition, program-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or could occur, because of the World Bank's non-compliance with its policies and procedures. Complaints

may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank's attention, and after Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank Inspection Panel may be found at [www.inspectionpanel.org](http://www.inspectionpanel.org)

## 6.0 MONITORING AND REPORTING, TRAINING AND BUDGET

This Stakeholder Engagement Plan will be periodically revised and updated as necessary in the course of the implementation of the TA activities. The identified stakeholders and methods of engagement will be reassessed periodically to remain appropriate and effective in relation to the IPF context and specific stages of the implementation. Any major changes to the Program related activities and to its schedule will be duly reflected in the SEP.

**Table 7 Potential List of Monitoring Indicators**

Key aspect of stakeholder engagement	Detailed monitoring aspect / Potential indicator	Monitoring method
<b>Inclusion, accessibility, awareness, trust</b>	<ul style="list-style-type: none"> <li>• Stakeholder workshops/meetings organized</li> <li>• Stakeholder groups identified in the SEP who have been engaged by the project/PIU, disaggregated by stakeholder type, gender, other vulnerability/marginalized group (poor, disabled, illiterate, etc.), and topic of discussion</li> <li>• Geographical coverage of stakeholder engagement activities, disaggregated by urban and rural</li> <li>• Consultations with new stakeholder groups (where relevant)</li> <li>• All project beneficiaries' aware of project activities, their entitlements, and responsibilities</li> <li>• Individual meeting reports which capture number and nature of comments received, with comments raised distinguished by gender and vulnerable/marginalized group (e.g. at a community meeting), actions agreed during these meetings, status of those actions, and how the comments were included in the project</li> <li>• Assessments or evaluations on citizen feedback disaggregated by inclusivity aspects (e.g. analysis of citizen</li> </ul>	<ul style="list-style-type: none"> <li>• Participant lists</li> <li>• Workshop/meeting reports</li> <li>• Surveys</li> <li>• Desk reviews</li> <li>• Citizen score card</li> <li>• Interviews</li> <li>• Observations</li> </ul>

	<p>perceptions, disaggregated by gender, vulnerable/marginalized group, geographic location)</p> <ul style="list-style-type: none"> <li>• Stakeholders’ access to project information, dissemination materials, and consultations</li> <li>• Stakeholders’ readability of public dissemination materials under the project</li> <li>• Acceptability and appropriateness of consultation and engagement approaches vis-à-vis stakeholder groups</li> <li>• Community facilitators’ engagement with target beneficiaries</li> <li>• Sense of trust in project shown by all project stakeholders</li> </ul>	
<b>Communication</b>	<ul style="list-style-type: none"> <li>• Development and approval of a communications strategy</li> <li>• Project related press materials published/broadcasted in the local, regional, and national media relating to stakeholder engagements</li> <li>• Project specific communication tools developed (e.g. e-newsletters, websites, social media platforms, flyers, brochures)</li> <li>• Visitors to project related electronic media outlets (e.g. websites, social media platforms such as YouTube, Facebook, Twitter, LinkedIn)</li> <li>• External platforms carrying advertisements related to the project as part of its stakeholder engagement activities</li> </ul>	<ul style="list-style-type: none"> <li>• News articles</li> <li>• Press releases</li> <li>• Project communication strategy</li> <li>• Social media platforms</li> <li>• Project website</li> <li>• Brochures</li> <li>• E-newsletters</li> </ul>
<b>GRM</b>	<ul style="list-style-type: none"> <li>• Status of GRM establishment (procedures, staffing, awareness raising, etc.)</li> <li>• GRM results analysis which include, for example: <ul style="list-style-type: none"> <li>- Complaints received in a specific period</li> <li>- Complaints resolved, disaggregated by the GRM level at which they were resolved</li> <li>- Complaints pending</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Spot checks</li> <li>• GRM monitoring reports</li> </ul>

	<ul style="list-style-type: none"> <li>- Complaints received by age, gender, vulnerable/marginalized status, etc. of complainant</li> <li>- Complaints received by complaint type or project focus area</li> <li>- Complaints referred to the relevant GRM resolution mechanism</li> <li>- Complaints resolved within the stipulated response period</li> <li>- Channels for grievance submission</li> <li>- Comparison of the above with previous reporting periods</li> <li>• Frequency of information provision to stakeholders about the GRM</li> <li>• Training sessions that covered GRM</li> <li>• Identification of factors that can influence the use of the GRM</li> <li>• Corrective actions through the GRM used to inform project implementation</li> <li>• Preparation of summaries of GRM results on a monthly or quarterly basis, including suggestions and questions, to the project team and management</li> <li>• Publishing grievances received and resolved of annually</li> <li>• Project/region/national level stakeholder consultation mechanism developed to provide updates on the project’s performance on grievance redress</li> </ul>	
<b>Budget and staffing</b>	<ul style="list-style-type: none"> <li>• Sufficient resources (budget and staffing) to undertake stakeholder engagement activities</li> <li>• Recruitment of a M&amp;E Specialist, if applicable</li> <li>• Recruitment of GRM administrator/s, if applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Details workplans</li> </ul>

**6.1 Reporting**

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 staff of MoF-PCO and referred to the Social Safeguards focal persons or GRM

disgruntled focal persons of MoF-PCO. The GRM summaries will form part of the Program reporting requirements to the World Bank.

## 6.2 Training

The MoF will arrange for the necessary training associated with the implementation of this SEP. Specialized training will also be provided to the staff appointed to deal with stakeholder grievances as per the Public Grievance Procedure. The TA component consultants, particularly the IVA and selected representatives will also receive necessary instructions for the Grievance Procedure.

## 6.3 Budget for the Implementation of the SEP

The implementation of this SEP will be integrated into the execution of the IPF component of the Program to ensure stakeholders are engaged in all phases of the Program. An estimated funding of US\$ **1,542,000** has been allocated for the SEP implementation as part of the overall IPF component cost, which would fund all multi-stakeholder engagements at all levels, including the headquarters, regional and district levels. As such, the budget for implementation of stakeholder engagement activities has been fully integrated in the activities' budget. All policy related activities include budgets for stakeholder consultations and engagements. All field-based activities are planned to start with adequate sensitization, awareness creation, and engagement.

**Table 8 SEP Implementation Budget**

<b>Proposed Activity</b>	<b>Estimated Cost Year 1 – 2 (USD)</b>	<b>Estimated Cost Year 3 – 4 (USD)</b>	<b>Estimated Cost Year 5 (USD)</b>	<b>Total Cost (USD)</b>
Media announcements and commercials/adverts /radio/ tv	82,000	82,000	41,000	205,000
Social Media engagement including	138,400	108,400	54,200	301,000

production of short videos				
Disclosure of E&S information in widely circulated national news papers	50,000	50,000	25,000	125,000
Project IE&C materials e.g., leaflets, brochures, fact sheets, newsletters, brail materials	20,000	20,000	10,000	50,000
Feedback and Suggestion Box	1,000	-	-	1,000
Surveys, interviews and independent evaluations	-	30,000	30,000	60,000
Community / townhall/ public meetings	50,000	50,000	25,000	125,000
Workshops	150,000	150,000	70,000	370,000
Focus group meetings	50,000	50,000	30,000	130,000
Grievance Redress with dedicated	30,000	30,000	15,000	75,000

hotline and short code				
Monitoring	40,000	40,000	20,000	100,000
<b>Grand Total</b>				<b>1,542,000</b>