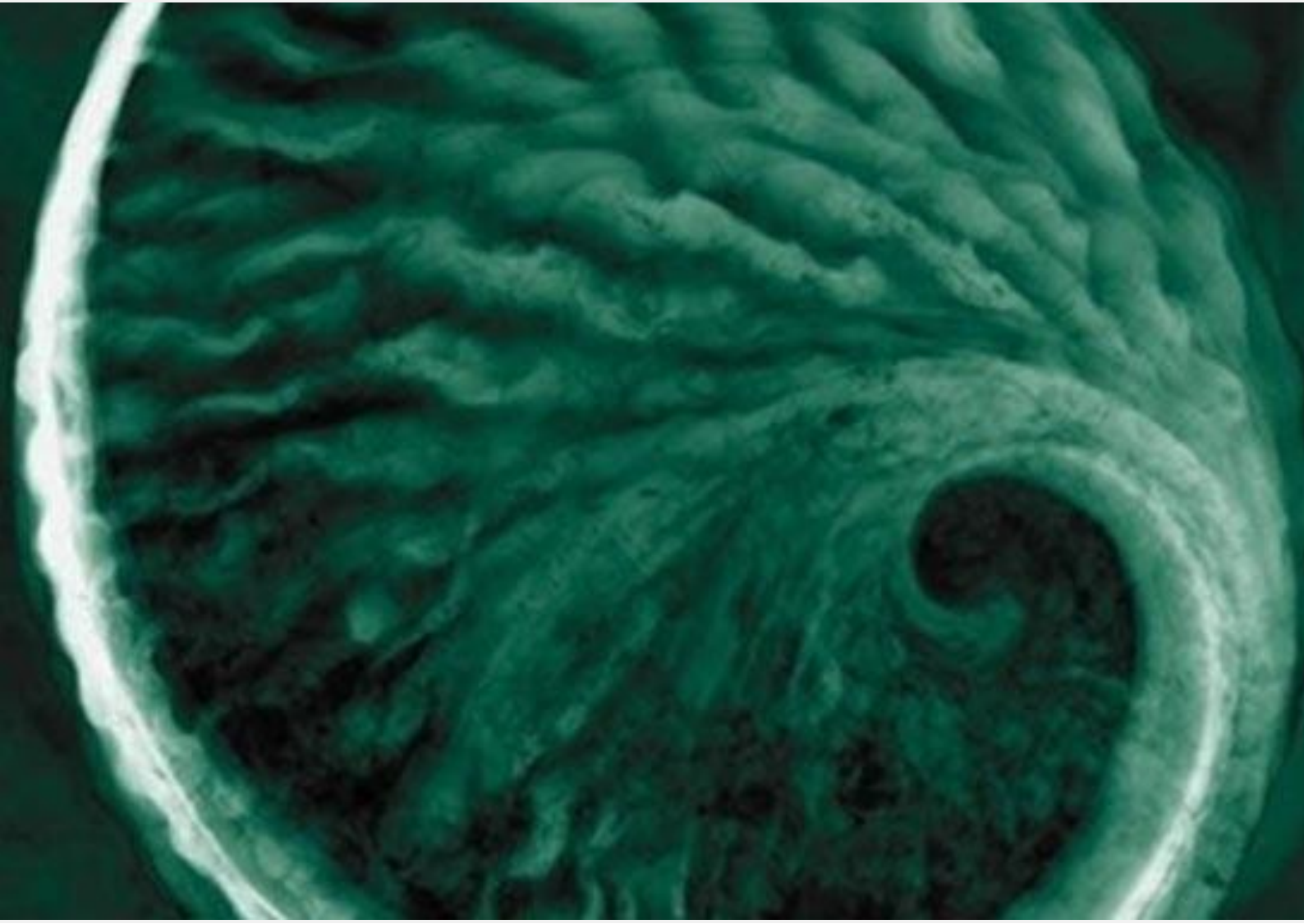


Stakeholder Engagement Framework

Green City Kigali Project, Rwanda

28 January 2021

Project No.: 0559023

The business of sustainability

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28 January 2021

Stakeholder Engagement Framework

Green City Kigali Project, Rwanda

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Acronyms and Abbreviations

Name	Description
BMZ	German Ministry for Economic Development and Cooperation
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
E&S	Environmental & Social
ESIA	Environmental and Social Impact Assessment
FONERWA	Le Fonds National de l'Environnement du Rwanda (French), Rwanda Green Fund
FPIC	Free, Prior and Informed Consent
GCF	Green Climate Fund
GCK	The Green City Kigali Project
KfW	German Development Bank - Kreditanstalt für Wiederaufbau
NGO	Non-Government Organisations
REMA	Rwanda Environment Management Authority
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
WB ESS	World Bank: Environmental and Social Standards

1. INTRODUCTION

This document presents the Stakeholder Engagement Framework (SEF) for the Green City Kigali Project (hereinafter referred to as “GCK” or “the Project”), guiding the process of engagement, consultation and disclosure for all sub-components by setting relevant requirements in line with Applicable Standards (refer to Chapter 4 of the Masterdocument).

The purpose of the Project is to create a model community in Kigali, which demonstrates and sets standards for sustainable urban development that can be replicated in other parts of the country and the wider region, by combining climate change resilience with affordable housing solutions. The Project site is located on Kinyinya Hill in the northeast of the central business district of Kigali, in the district of Gasabo and comprises an area of around 600 hectares.

A detailed Project description is included in Chapter 3 of the Masterdocument.

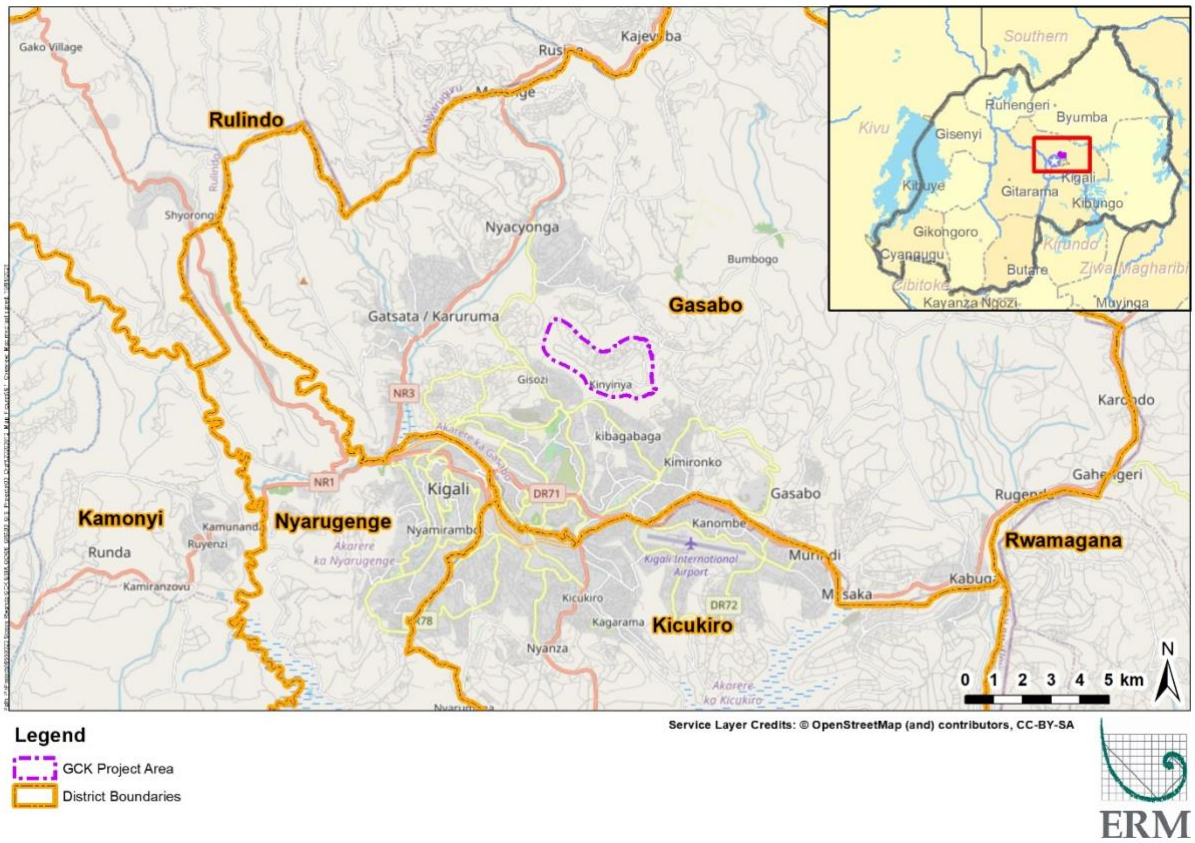


Figure 1-1 Project Location Kinyinya Hill, Kigali, Rwanda

1.1 Purpose and Objective

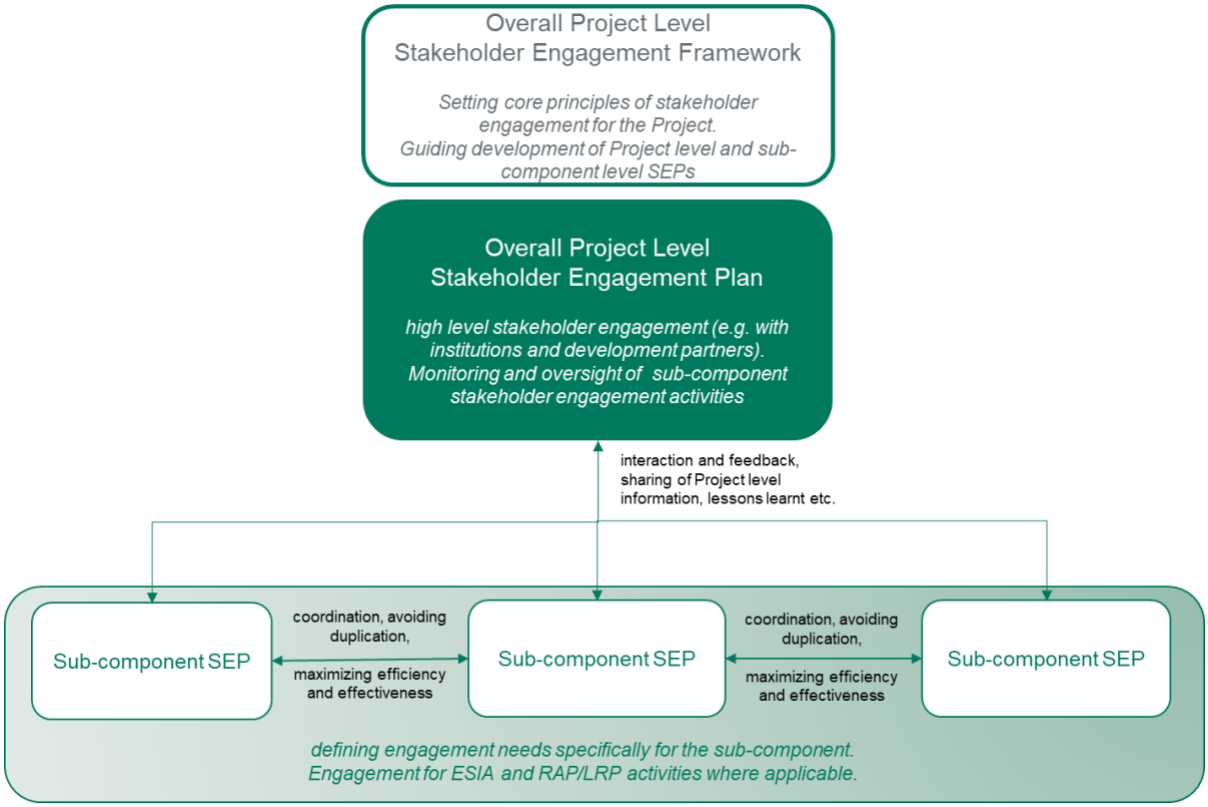
The purpose of this SEF is to provide applicable guidance and to set requirements for the various elements of adequate stakeholder engagement to be undertaken for the Project.

Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of affected and /or interested parties. Stakeholder engagement is built on mutual trust and likewise is designed to build trusting relationships based on collaboration among stakeholders. Appropriate stakeholder consultation and disclosure are key elements of successful engagement and are essential parts of the Project’s environmental and social

(E&S) performance requirements. The importance of stakeholder engagement applies throughout the stages of planning, implementation and operation of the Project.

The Project is currently in the masterplanning phase and detailed designs of Project sub-components are yet to be undertaken and finalized. Accordingly, the overall aim of this SEF is to provide a framework to identify the actions the Project needs to undertake to ensure that a timely, consistent, comprehensive, coordinated and culturally appropriate approach is taken to consultation and Project disclosure. The framework includes the core principles and applicable guidance for stakeholder identification and mapping, engagement, information disclosure, consultation meetings and public participation. It is intended that as the Project progresses and sub-components are developed then specific Stakeholder Engagement Plans (SEPs) are prepared and implemented as appropriate.

This SEF therefore provides an outline of the requirements for subsequent SEPs (refer to Appendix A for a general structure of a SEP). The SEF also includes the description of processes, strategies and responsibilities for developing and carrying out Project-wide SEP and SEPs for sub-components as they are developed. In addition, all sub-components under the Project will be required to establish a formalised procedure or process for stakeholder engagement in a form of a SEP according to this SEF. Figure 1-2 provides an overview of the anticipated levels of stakeholder engagement (more details are provided in Chapter 4).



Source: ERM, 2020

Figure 1-2 General Overview of Stakeholder Engagement Levels

1.2 Applicable Requirements for Stakeholder Engagement and Information Disclosure

Stakeholder engagement for the Project, including all sub-components, shall be performed according to the following requirements:

- Legislative requirements of the Republic of Rwanda;
- Principles and procedures specified by the World Bank (WB): Environmental and Social Standards (2018), specifically Environmental and Social Standard (ESS) 1, 5, 8 and 10.
- WB Good Practise Note on non-discrimination and disability (2018)1;
- WB Good Practice Note on Gender (2019)2.

Project-related Stakeholder Engagement activities shall seek to comply with both national and international standards. Where gaps exist, the Project shall apply the more stringent requirements.

A detailed description of the Applicable Standards and relevant institutional frameworks is included in Chapter 4 of the Masterdocument.

2. STAKEHOLDER ENGAGEMENT POLICY AND PRINCIPLES

The Project recognises the importance of open and transparent engagement between citizens/local communities, different levels of administration and authorities, project workers, local communities directly affected by projects and, where appropriate, other stakeholders, as an essential element of good international practice (GIP) for engagement and corporate citizenship[3]. Such engagement is also a way of improving the E&S sustainability of projects. In particular, effective community engagement, appropriate to the nature and scale of the project, promotes sound and sustainable E&S performance, and can lead to improved financial, social and environmental outcomes, together with enhanced community benefits. Stakeholder engagement is central to building strong, constructive and responsive relationships which are essential for the successful management of a project's E&S impacts and issues. To be effective, stakeholder engagement will be initiated at an early stage of the Project cycle, and sub-component project cycles, and will be carried out through all phases of the Project life.

The overall Project and its sub-components will need to conduct stakeholder engagement on the basis of providing local communities that are directly affected by the Project and other relevant stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate, inclusive and gender sensitive manner, and free of manipulation, interference, coercion and intimidation.

Key principles of effective engagement include:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;

[1] http://documents1.worldbank.org/curated/en/573841530208492785/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Disability-English.pdf

[2] http://pubdocs.worldbank.org/en/158041571230608289/Good-Practice-Note-Gender.pdf

[3] FONERWA is in the process of developing an overall Stakeholder Engagement Handbook to be applied to all activities in conjunction with FONERW's overall ESMF.

- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people's concerns, suggestions, and grievances while protecting personal data and information; and
- Incorporating, where appropriate and feasible, feedback into project or sub-project design, and reporting back to stakeholders.

3. ENGAGEMENT ACTIVITIES TO DATE

A number of community and stakeholder engagement activities have been conducted during the High Level ESIA and the previous preliminary ESIA (pESIA, Sweco 2019) conducted in 2019.

During initial scoping phase as well as for the 2019 pESIA preparation (Sweco, 2019), site visits including transect walks with community members and leaders have been conducted. These activities supported the initial identification of potential impacts as well as stakeholder identification.

FONERWA organised meetings with Gasabo District and local community leadership to discuss the Project objectives and key impacts.

Stakeholder engagements were conducted during the following periods:

- During the 2019 Pre-ESIA study;
- During the 2019 Mid-term Feasibility Study Urban Labs;
- During the 2019 Mid-Term Feasibility Study Validation Workshop; and
- During the May 2019 public disclosure of the Kigali Master Plan.

An overview of stakeholder disclosure and engagement activities to date is provided in the table below.

Table 3-1 Overview of Engagement Activities Conducted to Date

Type and Mode of Engagement	Method of Engagement	Date	Stakeholder Group	Institution	Objective of Engagement	Key issues raised/discussed Outcomes of engagement
Consultation Disclosure	**Urban Lab** Public and Stakeholder Participation	04 – 10 May 2019 (5 days)	▪ Local communities ▪ their representatives /respective authorities ▪ Media ▪ Experts: - Urban Planner, Kigali City - Environmental Analyst RDB - Environmental Planning and Development, REMA - Head of Unit Environmental Regulation and Pollution Control, REMA - Environmental Protection Specialist, MoE - Kinyinya Sector: Ngaruyinka, Murama	▪ FONERWA; ▪ KfW; and ▪ International experts: SWECO, OMGEVING (landscape architect)	▪ Work sessions with experts and stakeholders. ▪ Gathering valuable information. ▪ Developing future scenarios in co-production with the public stakeholders and end users of the GCK. ▪ Raising awareness of the project. ▪ Updating community members and stakeholders on the status of the project.	Visual report that : ▪ Captures key findings of discussions ▪ Illustrates possible spatial models for urban development in the GCK Pilot. ▪ Outline structure, connectivity, environment, building patterns and location of services. Annex 1 of the mid-term feasibility study includes issues communities informed about (infrastructure, jobs, social development, climate change) and includes comments of the stakeholders. Key issues raised: Impacts of land acquisition on livelihoods and quality of living; Transport and Mobility (poor connection and safety for women on foot); Infrastructure (access to potable water, flood management); Housing (concern about project only catering for ‘elite’).

Type and Mode of Engagement	Method of Engagement	Date	Stakeholder Group	Institution	Objective of Engagement	Key issues raised/discussed Outcomes of engagement
Consultation Disclosure	Validation Workshop of the Mid-Term Feasibility Study	10. Sep 2019	▪ local communities, ▪ national ministries, ▪ international organizations	Feasibility Study Team	▪ Presenting main findings of the feasibility assessment ▪ Q&A sessions ▪ valuable Stakeholder comments and input to the study.	Urban planning, housing and building technology, infrastructure, cross cutting issues and special projects.
Consultation	Site visits and direct observation	2019	▪ local communities	Feasibility Study Team SWECO	▪ Site Walk over ▪ visit to existing housing projects, affordable and market projects. ▪ HH interviews to obtain information about housing preferences and aspirations for future surrounding built environment.	Information obtained for use in the development of unit, building and community level typologies as part of Feasibility Study process.
Consultation	Focus group, Expert opinions	2019	▪ Architectural students at University of Rwanda ▪ Architectural professional ▪ Housing and building technology professional ▪ Local quantity surveyors and providers	Feasibility Study Team SWECO	Gathering information and expertise for the housing and financial sector reports with feed into overall Feasibility Study.	Housing and building technology information and preferences. Key financial information and preferences as regards housing.
Consultation	Stakeholder Participation events	2019	3 community groups were consulted including Kimisagara, Batsinda and Kinyinya.	SWECO	Provide information as regards housing situation and aspirations for use in building sector report and pursuant Feasibility Study report.	Information obtained for development of unit, building and community level typologies as part of Feasibility Study process.

Type and Mode of Engagement	Method of Engagement	Date	Stakeholder Group	Institution	Objective of Engagement	Key issues raised/discussed Outcomes of engagement
Disclosure	Umuganda (Community service)	Monthly (Mar 2020 May 2020)	Community in the Kinyinya area	▪ GCK ▪ FONWERWA ▪ local administration ▪ media	Informing the directly affected population about the project. Encouraging an open dialogue and exchange between all stakeholders.	
Disclosure	Meeting	June 17, 2020	Mayor City of Kigali	▪ City of Kigali	Inform appointed person about GCK Project, update on work done and timeline of next phases on the project.	
Consultation	Focus Group, Expert Opinion	Sept 30, 2020	▪ Manager of Water & Sanitation Infrastructure Planning ▪ Acting Head of Sewer Operations ▪ Director of Rural Water & Sanitation Services	▪ Water and Sanitation Corporation (WASAC)	▪ Introduce the Green City Kigali Project and application to the Green Climate Fund ▪ Gain a better understanding of the water and sanitation situation at the upgrade site ▪ Discuss possible water and sanitation projects at the site, for assessment in a Feasibility Study prepared for an application to the Green Climate Fund	Detailed information about use of water, availability of potable water access and sanitation facilities. Overall understanding that potable water coverage is inadequate.
Consultation	Focus Group, Expert Opinion	Oct 23, 2020	▪ Solid & Liquid waste Officer ▪ City of Kigali Engineer	▪ City of Kigali ▪ COPED	Understanding site situation regarding establishing recycling points, neighbourhood collection points and propose community of organic waste	No concerns raised provided it meets the required standards for the community and has a management manual.
Consultation	Focus Group, Expert Opinion	Oct 29. 2020	▪ City of Kigali Engineer ▪ DG RTDA ▪ Division Manager of Planning,	▪ City of Kigali ▪ Rwanda Transport Development Agency (RTDA)	Understanding who provides and maintains roads infrastructures.	

Type and Mode of Engagement	Method of Engagement	Date	Stakeholder Group	Institution	Objective of Engagement	Key issues raised/discussed Outcomes of engagement
			quality assurance &Research			
Disclosure	Virtual Validation Workshop of the Final Feasibility Study	Nov 09 – 13, 2020	▪ National ministries, ▪ International organizations	▪ FONERWA; ▪ KFW ▪ International experts: SWECO	▪ Introduction of KfW mission objectives, ▪ General status of the project, ▪ Main results of the Feasibility Study, ▪ Challenges ahead	
Disclosure	Validation Workshop of Ngaruyinka Upgrade Interim Feasibility Study Report	Dec 11, 2020	National ministries	▪ FONERWA ▪ MoE ▪ RHA ▪ WASAC ▪ REG	▪ Introduction of the upgrade of informal settlement of 18ha Ngaruyinka Village ▪ Basis of GCF application ▪ Presentation of the Interim Feasibility Study ▪ Discussion	
Consultation	Virtual Meeting, Expert Opinion	Dec 18, 2020	National ministry & institution	▪ FONERWA ▪ WASAC	▪ Short Overview of Recommendations for the Pilot Site ▪ Pilot Site Discussion ▪ Short Overview of Recommendations for the Global Climate Fund application for the Upgrade Site	
Disclosure	Radio Programme	Monthly consisting of six episodes of 30 minutes	Local communities	▪ GCK ▪ FONERWA ▪ Local radio station	▪ Informing the local communities about Rwanda's sustainable approach to urban development in an easy and accessible language. ▪ Addressing questions and concerns from the local population, provides information about climate change and rapid urbanization	

Type and Mode of Engagement	Method of Engagement	Date	Stakeholder Group	Institution	Objective of Engagement	Key issues raised/discussed Outcomes of engagement
					and introduces concepts such as sustainable building and resource efficiency to a wide and diverse audience.	
Disclosure	Comic book for children	Issued – June 2020	Children and young population of Kigali and Rwanda	▪ GCK ▪ FONERWA ▪ Rwandan publishing house Imagine We Rwanda	▪ Developing a comic book for children. ▪ Familiarising children and youth with the topic of sustainable urban development and its relevance for Rwanda's future growth trajectory. ▪ Raising environmental awareness and promoting sustainable behaviour amongst the young population.	
Disclosure	Website Social media (Instagram, Facebook, twitter, YouTube channel) Newsletter Subscription		Various Stakeholders	▪ GCK ▪ FONERWA	Publications: ▪ Urban Design Handbook ▪ Mid-Term Feasibility Study	

4. STAKEHOLDER ENGAGEMENT FRAMEWORK

Following the engagements conducted to date (see Chapter 0) and in line with the applicable Stakeholder Engagement Principles (Chapter 0), this chapter establishes the SEF elements for the Project. Figure 4-1 below displays the core elements of stakeholder engagement that underpin the Project SEF.



Source: ERM, 2020

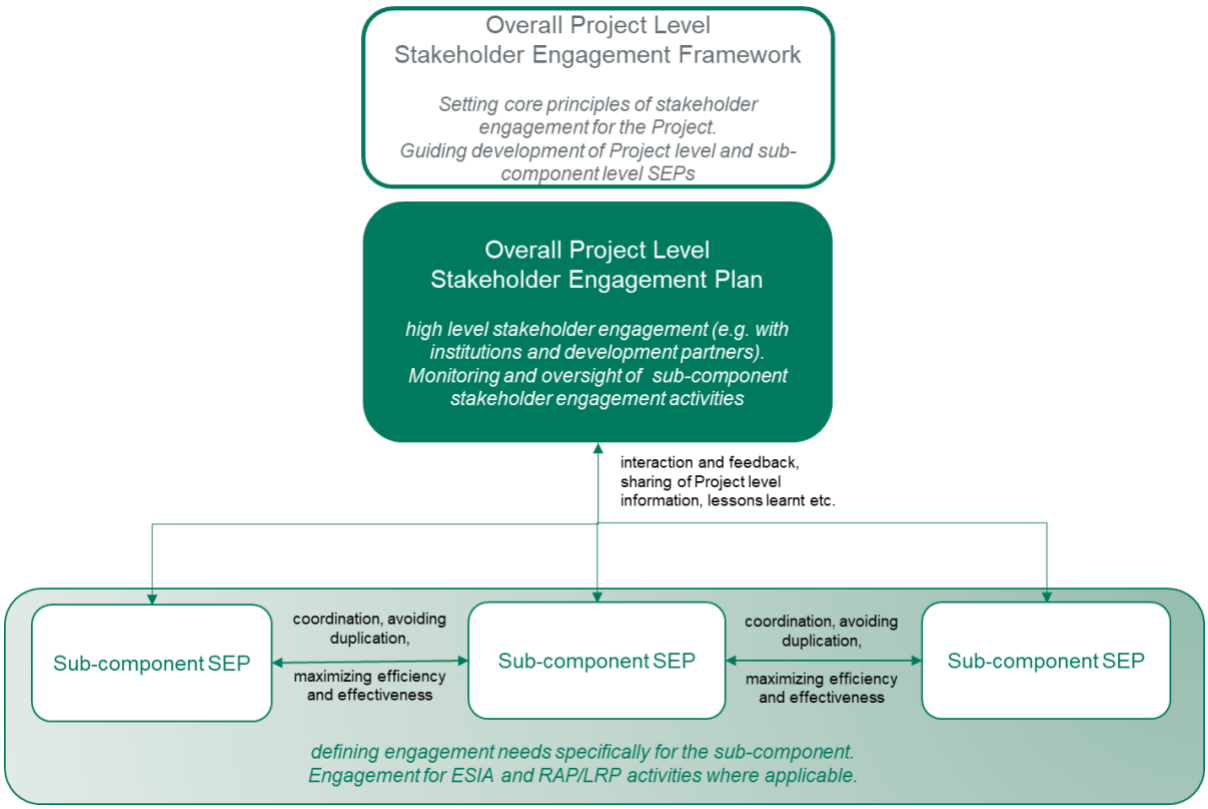
Figure 4-1 Core Elements of Stakeholder Engagement

The key elements of the SEF are:

- Identification of relevant stakeholders (Section 4.2).
- Engagement and meaningful disclosure methods about Project-related E&S risks and impacts (Sections 4.3 and 4.4).
- Grievance process (Section 4.6).
- Monitoring, documenting and reporting (Sections 4.7 and 4.8).
- Staffing requirements (Section 5).

4.1 Managing Engagement of Project-wide Activities and Sub-Component Activities

Various levels of stakeholder engagement are expected according to the development activities being undertaken (see Figure 4-2). As this SEF guides the overall stakeholder engagement activities for the Project, it also provides the scope for consultation for all sub-components, as required. For example, where a sub-component is associated with land acquisition and subsequent physical and/or economic displacement, the sub-component will be responsible to plan and conduct the relevant adequate stakeholder engagement activities with regard to resettlement and livelihood restoration planning. The same applies to any sub-component requiring the implementation of an Environmental and Social Impact Assessment (ESIA) which following will be associated with some degree of stakeholder engagement. In order to avoid duplication and consultation fatigue with stakeholders, the engagement process will be coordinated and timed to avoid overlapping where practicable, and the objectives of each engagement activity shall be made explicit. In this way, lessons learnt can be shared and overall efficiency and effectiveness of Project wide stakeholder engagement can be increased. There will be interaction and exchange between the various sub-components as well as the overall Project level.



Source: ERM, 2020

Figure 4-2 General Overview of Stakeholder Engagement Levels

4.2 Stakeholder Identification and Analysis

A stakeholder is defined as any individual / group, who is potentially affected by the Project (affected parties) or who has an interest in the Project and its impacts (interested parties). The objective of stakeholder identification is to establish all parties that may be directly or indirectly affected by (positively and negatively / permanently or temporarily), or have an interest, in the Project. **Stakeholder identification is an ongoing process, requiring regular review and updating as the Project proceeds.**

The process shall identify the specific stakeholder individuals, groups, statutory and non-statutory representatives that the Project should engage with. To develop a systematic and effective means of engagement, stakeholders should be identified in relation to the overall Project as well as sub-components to be implemented. Relevant stakeholders are to be mapped out to understand their relationship to Project activities and how the Project could affect them.

Relevant Project level and sub-component level stakeholders will be identified through a variety of methodologies including:

- Desktop mapping exercise (e.g. for existing landholders);
- Formal discussions with local leadership and government agencies; and
- Community meetings, forums and group discussions.

When listing stakeholders, historical issues, social relations, relationships between local communities and the project implementer, and any other relevant factors may be considered.

Stakeholder identification shall be sensitive to vulnerable groups (i.e. those who may experience societal barriers on the basis of disability, gender, age, ethnicity, wealth, etc.). Vulnerable groups or individuals may be affected by the Project in a different and/or more significant way and could need to be considered as a separate stakeholder group requiring separate consultation formats. Hence, Project activities, specifically stakeholder engagement, need to be tailored to the individual needs and type of disadvantages ensuring additional support to participate in consultation and engagement where required (e.g. accessibility of information, engagement venues, etc. See more details in Chapter 4.4). Stakeholder engagement strategies may change over time and be adjusted to circumstances. Specific, individual interests, needs and priorities of vulnerable stakeholders will have to be identified and taken into account when considering mitigation measures and benefits. To support this process of identifying vulnerable stakeholders and their specific needs, as per the WB template for ESS 10[4] the following questions can be applied:

- *What might prevent these individuals or groups from participating in the engagement process? (For example, language differences, lack of transportation to events, accessibility of venues, disability, lack of understanding of a consultation process).*
- *How do they normally get information about the community, projects, and activities?*
- *Do they have limitations about time of day or location for public consultation?*
- *What additional support or resources might be needed to enable these people to participate in the consultation process? (Examples are providing translation into a minority language, sign language, large print or Braille information; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns.)*
- *If there are no organizations active in the project area that work with vulnerable groups, such as persons with disability, contact medical providers, who may be more aware of marginalized groups and how best to communicate with them.*
- *What recent engagement has the project had with vulnerable stakeholders and their representatives?*

The stakeholder identification shall be documented including the description of the stakeholders and of their interests in the Project. The stakeholder identification will include determining the level of communication appropriate for the Project and adequate for the different stakeholders.

Stakeholders' contact details will be recorded in the Project Database but managed in a confidential manner. The information will be recorded for contact purposes only and will not be shared with third parties. Stakeholders will be mapped and analysed to understand their relationships, likely key issues, and the most effective engagement means for various groups.

An initial stakeholder identification and analysis has been conducted, and stakeholders were grouped, based on their various needs and interest with the Project.

Table 4-1 Initial Stakeholder Mapping

Stakeholder Group	Project Interaction	Stakeholders
Central Government	■ Permitting and licensing; ■ Policy compliance and enforcement;	■ Ministry of Infrastructure (MININFRA); ■ Ministry of Environment (MoE); ■ Ministry of Local Government (MINALOC);

[4] Template for ESS10: Stakeholder Engagement and Information Disclosure Stakeholder Engagement Plan and Stakeholder Engagement Framework (June 2018) http://pubdocs.worldbank.org/en/909361530209278896/ESFTemplate-ESS10-SEP-June-2018.pdf

	■ Basic infrastructure servicing; and ■ Monitoring.	■ Ministry of Economic Planning and Finance (MINECOFIN); ■ Regulatory Bodies/Lead Agencies in these ministries including ; - Rwanda Environment Management Authority (REMA); - Rwanda Development Board (RDB); - Rwanda Land Management and Use Authority (RLMUA); - Rwanda Housing Authority (RHA); - Rwanda Transport Development Authority (RTDA); - Rwanda Energy Group (REG); - Water and Sanitation Corporation (WASAC); - Local Administrative Entities Development Agency (LODA); and - Gender Monitoring Office and National Women Council (to explore gender issues).
Local Government: City of Kigali	■ Oversight of Project; ■ Monitor for compliance; and ■ Issue licenses and permits.	■ Executive Committee; ■ Council of the City of Kigali; ■ Kigali Employment Services Centre; and ■ Cooperative Union.
Local Government and leadership.	■ Project Implementers; ■ Permitting, licensing and compliance enforcement; ■ Policy compliance; ■ Basic infrastructure servicing; ■ Monitoring; ■ Grievance Management; and ■ Community Liaison.	■ Gasabo District; ■ Kinyinya Sector; ■ Cell leaders; and ■ Village leaders.
Directly Affected Communities / Project Affected Persons	■ Affected by Project impact; ■ Engagement in Project (e.g. labour); and ■ Loss/damage and/or improvement of property.	■ Communities living on the Project site (land owners and land users); ■ Communities living close to Project site; and ■ Communities having livelihoods based on the Project site.

Vulnerable Persons/Groups	■ Interaction with project impacts; ■ Inadequate ability to cope with negative project impacts; ■ Inadequate ability to enjoy project benefits unaided; and ■ Special needs different than the rest.	■ The poor Households (HH) as identified by the National livelihood categorisation (Ubudehe); ■ the elderly; ■ the sick, disabled; and ■ women.
Civil Society Organisations and (I)NGOs	■ Support to the affected persons / communities; ■ Exchange of useful data and information from experience in the communities; ■ Project may hinder or enhance their works with the communities; and ■ May supplement Project benefits.	■ Community Based Organizations, Women Organisation, National-category NGOs i.e. RECOR (Rwanda Environmental Conversation Organization), International NGOs i.e. Human Rights Watch, Transparency International Rwanda, World Vision, IUCN, OXFAM, CARE, WWF, etc.
Development Partners	■ Information and knowledge exchange; ■ Technical assistance; and ■ Establish cooperation and joint initiatives.	■ UN Habitat; ■ World Bank; and ■ GIZ.
Media, Political groups, Religious Organisations	■ Cascading Project information to the public; and ■ Influence on public views and opinions on the Project.	■ District, local, national and international media (newspapers, television and radio stations); ■ Local schools and health institutions; and ■ Religious denominations.
Private Sector	■ Supply of Project inputs and management of outputs; and ■ Professional and technical services to the Project.	■ Contractors; ■ Suppliers and service providers; ■ Potential employers; and ■ Other businesses operating within Project communities.
Law Enforcement Agencies	■ Security.	■ Rwanda Police.

In the course of developing an overall Project SEP and sub-component specific stakeholder engagement strategies and plans, the identification and analysis of stakeholders is to be continued and specified along the procedures outlined above.

4.3 Information Disclosure

Timely and transparent disclosure of information about the Project is essential to guide the process of stakeholders in understanding and evaluating the risks, impacts and opportunities and positive impacts of the Project. In line with the Applicable Standards (see Chapter 4 of the Masterdocument), the Project shall provide stakeholders with Project information on an ongoing basis throughout Project planning, development and implementation (e.g. disclosure of ESIA, RAP/LRP, SEP, ESMP, etc.). Where feedback requires changes and / or adaptations to Project development as well as engagement plans, these updates will be communicated to affected communities.

The following type of information shall be made available to Project stakeholders:

- The type and duration of Project activities;
- Potential E&S risks and impacts of the Project and intended mitigation measures;
- Potential benefits, positive E&S impacts and employment opportunities;
- Investment or corporate social responsibility programs;
- Planned stakeholder engagement, consultation and participation processes;
- Communication channels and timelines;
- Process of submitting grievances and how they will be managed;
- Management and monitoring measures.

As certain sub-components of the Project will involve land acquisition, potentially causing physical or economic displacement, specific information in this regard needs to be provided to affected people. The information needs to include the extent of land acquisition, the process including eligibilities to entitlements, specific timelines (e.g. cut-off date) and grievance mechanism. The Project's Resettlement Policy Framework (RPF) includes more detailed information with regard to these requirements. Where relevant, a Resettlement Action Plan and/or Livelihood Restoration Plan for the respective sub-component will include detailed disclosure requirements.

All information will be provided in relevant languages (i.e. English and Kinyarwanda) and accessible to all affected stakeholders. The Project will ensure the information to be disclosed will be culturally and technically appropriate to each stakeholder group (consideration of literacy levels, disability specifics and availability of internet access, etc.). In particular, the Project activities and their associated impacts will be presented in non-technical language to local communities to ensure they are fully understood. Note, the disclosure formats chosen are to provide safe access to information. Therefore, in the context of the COVID-19 pandemic, information campaign and events are to be designed in a safe manner, in line with relevant local safety restrictions and recommendations. Where public meetings and events are deemed to be unsafe, emphasis is to be placed on virtual/digital disclosure mechanisms without compromising the accessibility of information. To ensure all affected stakeholders are reached, including vulnerable groups, various channels will be used for information disclosure, including, but not limited to:

- Project website;
- Local Government Headquarters (hard copies);
- Community centres and public places (churches, health centres, etc.);
- Project information centres;
- Project information mobile App;

- Social media presence (facebook, Instagram, whatsapp, etc.);
- Public information campaigns;
- Public information events;
- Community meetings.

4.4 Stakeholder Consultation

Meaningful consultation is key to provide stakeholders with opportunities to express their views on project E&S risks, impacts, and mitigation measures, and to allow the Project to consider and respond to them. Meaningful consultation is to be carried out on an ongoing basis as the nature of issues, E&S impacts and opportunities evolves.

The Project shall ensure that consultation with stakeholders is undertaken via an inclusive approach. This means all stakeholders shall be represented equally, to ensure that particular needs of e.g. vulnerable groups are taken into account as appropriate. Depending on the context, it may be reasonable to engage with vulnerable groups separately and provide individual or smaller group meetings, while including them in other community groups can increase overall visibility, raise their profile and potentially lead to higher inclusion. To ensure the various vulnerable groups' concerns are heard, it may be relevant to engage with the individuals directly as well as with representatives and support groups. The ideal engagement method for vulnerable groups and individuals will have to be adjusted to the circumstances and is likely to be a mix of the above described options. When choosing a suitable venue and method of engagement, needs of stakeholders with disabilities, also considering 'hidden disabilities', are to be taken into account to ensure adequate accessibility and meaningful engagement. Stakeholders are to be informed about decisions and changes in project planning along with reasons and considerations on which the decision is based. Specific consultation activities are to be undertaken with regard to the Project related land acquisition. To manage the resettlement process adequately, the Project shall conduct a socio-economic census survey and consult affected people when developing the resettlement strategy and agreeing to entitlements. The Project specific Resettlement Policy Framework developed for the Project includes a detailed consultation and engagement framework with regard to the project related land acquisition.

The Project will ensure the below outlined requirements for meaningful consultation according to WB ESS 10 are applied (see Box 4-1 and further details on Applicable Standards in Chapter 4 of the Masterdocument).

Box 4-1 Strategy for Meaningful Consultation According to WB ESS 10

In line with WB ESS 10 requirements, the strategy for meaningful consultation will ensure that the process:

(a) Begins early in the project planning process to gather initial views on the project proposal and inform project design;

(b) Encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;

(c) Continues on an ongoing basis, as risks and impacts arise;

(d) Is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;

(e) Considers and responds to feedback;

(f) Supports active and inclusive engagement with project-affected parties;

(g) Is free of external manipulation, interference, coercion, discrimination, and intimidation; and

(h) Is documented and disclosed by the Project.

A number of various consultation methods shall be applied but not limited to:

- formal meetings;
- public meetings;
- workshops;
- focus group discussions;
- key informant interviews (community stakeholders and relevant organisations); and
- survey, polls and questionnaires, etc.

When developing consultation programs, various disabilities are to be taken into account. For example, when using maps, pictures and other visual aids, consider the needs of stakeholders with a visual disability (and the same applies to all other disabilities, including 'hidden disabilities'). Consider literacy and education levels when using text in slide presentations.

Consultation shall be free of external manipulation, interference, coercion or intimidation. All engagement is to be documented adequately. Timing and means of consultations will be announced through various channels to ensure the information reaches all relevant stakeholders, including the Project website, public announcements, newspapers, national and local radio channels, poster boards, notices at public places, etc.

4.5 Remote Engagement Techniques

The COVID-19 pandemic requires additional health and safety considerations during proposed stakeholder engagement activities posing a risk to potential disease transmission. While the COVID-19 pandemic situation is perceived to be unique, health and safety is to be taken into account during any kind of infectious disease (ID) outbreak where appropriate. Specific health and safety considerations shall be taken when planning face-to-face stakeholder consultation activities. These considerations and restrictions are to be updated frequently as the local situation and response to the outbreak/pandemic evolves.

While one of the core principles of stakeholder engagement aims at building a trustful relationship between the Project and affected and interested parties, the importance for trust increases even more during a pandemic. A pandemic/outbreak can heighten the sense of isolation, deprivation, uncertainty, death, loss of control, etc. for communities and individuals. Therefore, it is even more important to ensure effective communication and interaction between Project and stakeholders to demonstrate a sense of presence and caring. While face-to-face meetings or community gatherings might not be the safe option for meaningful engagement, alternative means are available and to be explored by the Project. The Project will at all times comply with national and local restrictions such as hygiene recommendations, social distancing, wearing of face masks, meetings only in small groups, etc. Where possible, remote disclosure and engagement strategies are to be chosen to ensure health and safety of Project staff as well as any other stakeholder at all times.

In addition to mainstream media channels (e.g. radio, newspaper, television), the following disclosure methods, appropriate to social distancing measures and supporting the protection of health of all involved parties, can be used to provide information about the Project, impacts and mitigation measures; Project updates, Frequently Asked Questions (FAQs), information about the grievance mechanism, and include links to Project documents and further information:

- Project leaflets: e.g. information postcards including impact and mitigation summaries;
- E-mail campaigns and text-messaging: e.g. through Mailchimp, Whatsapp or similar (while ensuring personal data protection requirements);
- Signage using community notice boards and information panels at relevant locations.

Possible remote engagement formats can include, but are not limited to:

- Surveys and questionnaires to be administered via e.g. SurveyMonkey or SurveyPlanet to conduct socio-economic baseline surveys and obtain feedback on the Project, impacts and mitigation measures.
- Further online engagement (e.g. Social Pinpoint), social media (e.g. Facebook, Instagram, etc.), radio call-in shows and telephone engagement can be applied for ESIA and RAP consultations, ongoing dialogue with stakeholders, and to transmit questions, concerns and complaints.

The Project will ensure that engagement strategies and chosen formats are reviewed at an ongoing basis and adjusted when required to the local situation to ensure relevant health and safety precautions are considered and incorporated into the stakeholder engagement strategy.

4.6 Grievance Procedure

A grievance is considered to be any complaint, comment or suggestion about the way the Project is being implemented. It may take the form of specific complaint about impacts, damages or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments and concerns about Project activities during construction or operation, or perceived incidents or impacts have been addressed.

A Grievance Procedure specific to the Project will be developed with the following aims:

- To identify and manage stakeholder concerns and thus support effective risk management;
- To prevent adverse consequences of failure to adequately address grievances; and
- To build and maintain trust with all stakeholders.

A Grievance Mechanism is an established process to receive stakeholder concerns and grievances and to facilitate their resolution through a set procedure. Depending on the scale of potential risks and adverse impacts of a project, the grievance mechanism may be adjusted.

The general principles of an effective Grievance Mechanism are:

- Assignment of responsible person, team or function to organise the resolution of grievances;
- All stakeholders have the right to be informed about the Project and to raise concerns and suggestions during the decision-making process;
- Grievances and concerns are to be addressed promptly and effectively;
- The process is to be transparent, culturally appropriate and anonymous (if required, protecting privacy of affected individuals);
- The Grievance Mechanism is to be accessible to all stakeholders at no cost and without retribution; and
- All stakeholders are to be continuously informed about the Grievance Mechanism.

4.6.1 Proposed Grievance Strategy

The Project will develop an overall central Grievance Strategy applicable to the entire Project including all sub-components. The overall Grievance Procedure will be linked to the individual sub-component, ensuring adequate exchange and passing on of relevant information.

The Grievance Procedure will be free, open and accessible to all, including disadvantaged and vulnerable groups, and comments and grievances will be addressed in a fair and transparent manner. Information about the procedures, who to contact and how, will be made available to all stakeholders. The Project's Grievance Mechanism is to ensure the effective handling of all grievances in a fair and transparent manner, throughout the Project lifetime. The grievance procedure is to be designed to take into account the needs of vulnerable groups. All complaints will be investigated to establish their validity and to ensure that all accepted grievances are dealt with in a correct and prompt manner. If required, corrective actions will be implemented, documented and communicated to prevent any recurrence of problems.

The general grievance procedure comprises the following steps:



Source: ERM, 2020

Figure 4-3 General Grievance Procedure

The Grievance Mechanism will include but not be limited to:

- A template (record form) for logging complaints and suggestions (See Appendix B);

- Grievance letter boxes established at central and public locations (sufficiently spread throughout Project area to ensure accessibility);
- A direct phone line made available for anybody interested in communicating about the Project;
- An appropriate access via emails, text messaging and whatsapp or similar;
- Appropriate access through direct meetings with responsible Project persons at the Project site and representatives (e.g. CLOs) at community centres before, during and after construction works; and
- An online complaint form.

The Project needs to ensure that above-mentioned elements are accessible and available to all stakeholders. The grievance form should be made available at relevant municipalities of affected communities. The template will be available in the local administration office and anybody interested in any aspect of the Project can log it whenever necessary. The Project will collect logged grievances on a regular basis (e.g. once a week). The direct phone number and email address from the relevant managing party of the Project (e.g. community liaison officer, public communications or similar position – see Section 5) will be provided to all interested parties for enabling them to contact the Project's representatives whenever necessary. Furthermore, an online contact form will be available on the Project website.

A complaint is considered to be valid if it is submitted using one of the above-mentioned channels. All valid complaints received (including the ones received during ESIA disclosure) will be processed and registered in a dedicated grievance log. The grievance registries will be kept in order to track all grievances and to be able to present these registries upon any request from lenders or other relevant entity. The period of time for registry keeping and the methods for archiving documents should be established by internal procedures.

The central log will include the following information:

- Date lodged by complainant;
- Contact details of complainant (if not anonymously submitted);
- Name of the technical staff charged with addressing the complaint, if appropriate;
- Type of grievance and general information;
- Proposed resolution of the complaint;
- Due date;
- Decision;
- How and when relevant Project decisions were communicated to the complainant;
- Feedback from the complainant;
- Results; and
- Closing date of the issue.

Close out form signed off by the complainant will be obtained and registered into the system.

On an overall Project level, a dedicated employee (e.g. Grievance/Communication Manager, Community Liaison Officer) will be responsible to review all aspects of each grievance and reach a decision on the next step. Where the employee cannot reach a decision, Project management shall be responsible to determine the next steps, which amongst others may involve additional experts/personnel to support the Grievance Manager for a further review or may involve the Project management determining the decision to be implemented. Where the complaint refers to a specific sub-component of the Project, the dedicated employee is to forward the complaint to the respective sub-component. Each sub-component therefore, is to establish a dedicated role ensuring adherence

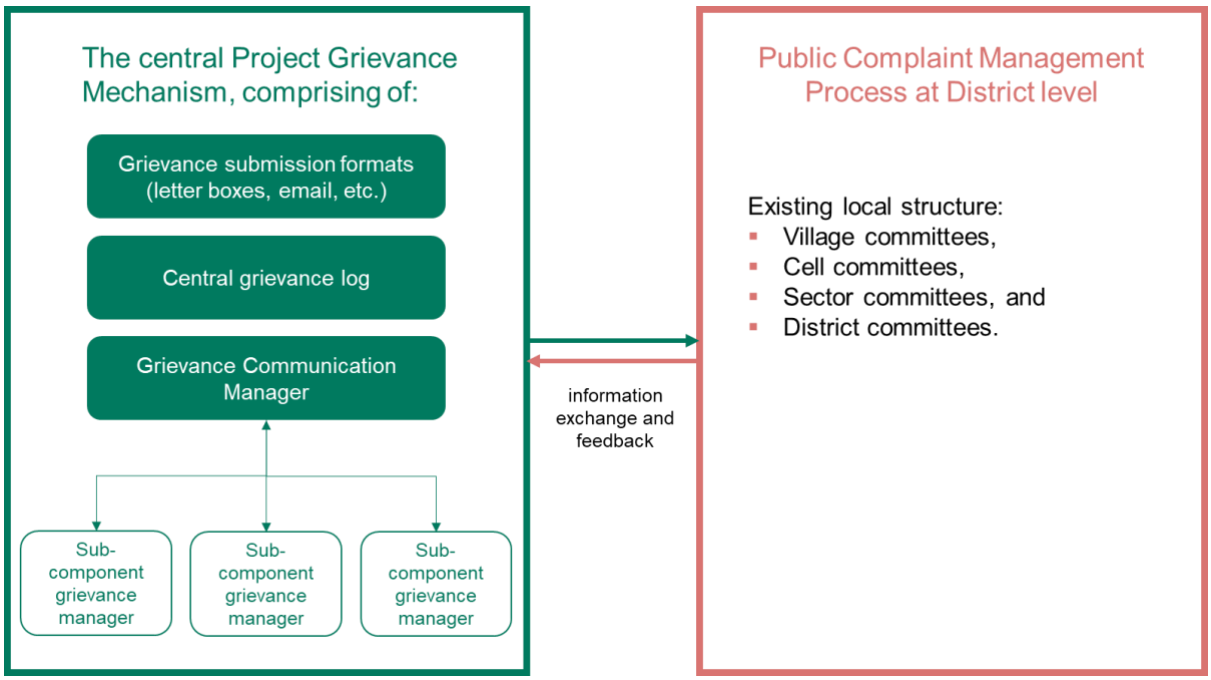
to the overall procedure outlined so that each complaint is adequately addressed. The Project will make all reasonable efforts to address the complaint upon acknowledgement of the grievance, progress chasing with the responsible person/department if actions are overdue and escalating any major problems to senior management.

All grievances will be acknowledged within seven days and responded to no later than 30 days. Once a grievance is logged, the related E&S event(s) that caused the grievance will be tracked to ensure proper closed-out of the grievance and prevent similar grievances.

If the complainant is not satisfied with the solutions proposed/ implemented to address the grievance, one may seek other legal remedies in accordance with the legal framework of Rwanda.

Where a grievance is passed to a third party for resolution, it is important to recognise that the ultimate responsibility for grievance resolution lies with the Project, including such cases where the third party fails to reach an acceptable resolution.

The Project will ensure relevant exchange with the existing public complaint management process at District level. The existing structure allows the public to raise complaints at village, cell, sector and district committees. The Project will establish relevant relationships with named committees to set up appropriate forwarding and follow-up procedures. This will allow that grievances are categorised correctly and then forwarded to the responsible entity, ensuring efficient and timely response. Furthermore, the Project shall set up regular feedback meetings with the existing committees to exchange experiences, evaluate resolved and unresolved grievances that might be relevant to more than one or all involved entities.



Source: ERM, 2020

Figure 4-4 Interaction between Project, Sub-Component and District Level Grievance Management

4.7 Documentation and Reporting

To ensure transparent Stakeholder Engagement and internal and external communication, documentation is key. Therefore, besides the information already documented in this SEF (i.e. overall requirements for stakeholder engagement), each Project and sub-component specific Stakeholder Engagement Plan (SEP) will include a comprehensive list of all identified stakeholders, including vulnerable groups. General personal data protection measures are to be considered at all times (keeping personal contact details confidential, etc.)[5].

Furthermore, in the course of defining the level of communication, the type of documents that will be released, the schedule, location of release (physical and /or media) and public notification procedures will be specifically documented.

The Stakeholder engagement process is expected to identify E&S topics associated with the Project. The Project aims at addressing every issue raised in an adequate and timely manner, compile individual responses and arrange further meetings where necessary. This shall provide input and consideration in the overall decision-making process. To guide and manage this process, documentation and reporting of all stakeholder engagement is required. All grievances shall be logged in a register and tracked (see details in Section 4.6 above). All consultation meetings shall be minuted, agreed and documented within the consultation register. All documentation will be recorded in the Project Monitoring and Evaluation Information System (MEIS).

Overall, all stakeholder engagement related documentation has to be recorded in the MEIS, which should include, but not be limited to:

- Stakeholders identification register: On-going updates to the list, including key contacts and contact details (telephone number, email address etc.) as additional stakeholders are identified.
- Stakeholder dialogue log: Used to store, analyse and report on stakeholder dialogue activities. It will be populated with details on information presented, audience questions, responses and actions, and meeting evaluation results, when appropriate. The database will also be used to track frequency of meetings over the life of the Project.
- Commitments register: Used to keep track of the commitments made to various stakeholders.
- Meeting minute template: Used to collect meeting minutes to be filed within the stakeholder database; including date, participants, information disclosed, comments, questions and concerns raised by the stakeholders and answers given by the Project;
- Grievance log will record all grievances received, management actions and whether it has satisfactorily been closed out.
- Media monitoring of press and radio stories relevant to the Project.

Records will be reviewed on a quarterly basis to ensure that records are being used and maintained. Commitments and actions recorded during community interaction activities will also be regularly reviewed to ensure they are taken forward.

Each sub-component's developer will prepare monthly reports on stakeholder engagement activities for the Project level implementing entity, which will include:

- Engagement activities conducted during the month (meetings with stakeholders and newsletters issued) and the feedback received (e.g. issues, concerns, expectations);
- Grievances lodged and/ or under investigation;
- Lessons learned during engagement;
- New stakeholder groups identified (if any); and

[5] General Data Protection Regulation (GDPR) Compliance Guidelines: https://gdpr.eu/

- Plans for the next month.

Monthly reports will be used as a basis for annual reporting. Each SEP developed for the Project and sub-components shall be a living document, updated on a regular basis to reflect the actual status of the development activities and its area of influence (e.g. new stakeholders identified, new engagement activities etc.). Each SEP will be reviewed at planned intervals (in accordance with monitoring intervals) to ensure its continuing suitability, adequacy and effectiveness. Reviews will include assessing opportunities for improvement and the need for changes to the stakeholder engagement process, including the overall framework and engagement principles, objectives and targets.

Input to these reviews will include

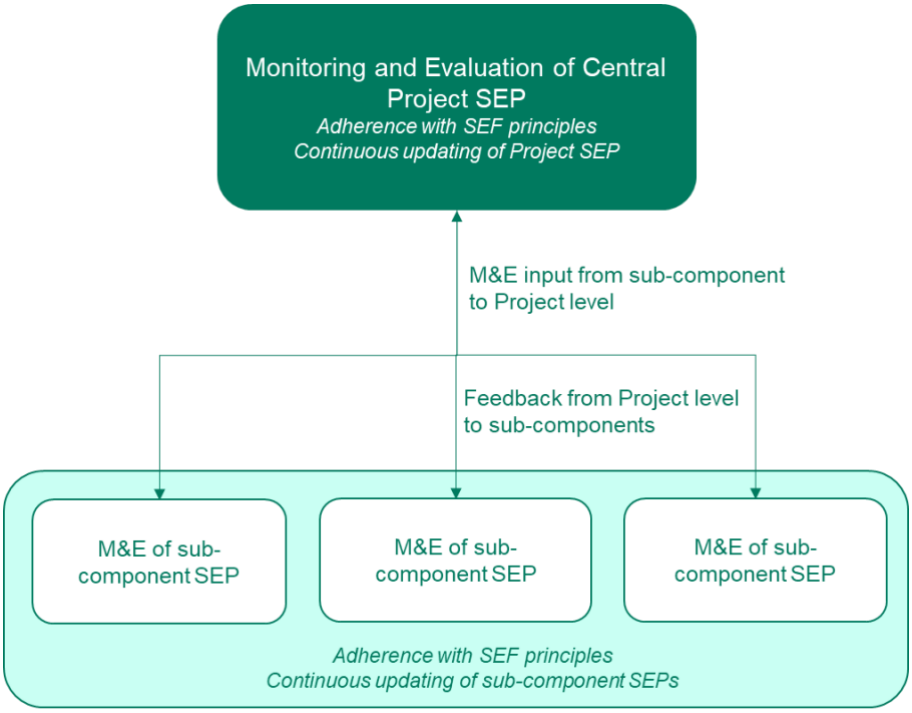
- Results of internal monitoring and evaluations of compliance with applicable requirements and this SEF;
- Communication(s) from external interested parties, including grievances;
- The E&S and specifically stakeholder engagement performance of the sub-component and the overall Project;
- Status of corrective and preventive actions;
- Follow-up actions from previous reviews;
- Changing circumstances, including developments in legal and other requirements related to its stakeholder engagement aspects; and
- Recommendations for improvement.

The outputs from reviews will include any decisions and actions related to possible changes to environmental policy, objectives, targets and other elements of the SEF or SEP..

4.8 Monitoring and Evaluation

The monitoring and evaluation (M&E) process will ensure the continuous improvement of the stakeholder engagement process of the Project and sub-components. Monitoring activities will investigate adherence with the overall stakeholder engagement principles.

Each sub-component will monitor its stakeholder engagement process, which will feed into the overall monitoring of the central Project level SEP (see Figure 4-5).



Source: ERM, 2020

Figure 4-5 Overview of Interaction between M&E at the Project and Sub-Component Level

In the monitoring and evaluation process for stakeholder engagement, all consultations undertaken, all issues raised, and the actions taken will be recorded on a central Project level. Any lessons learned and any changes to the consultation process shall be identified and reviewed as well. Likewise, monitoring outcomes will be fed back to communities and other stakeholders throughout the continuous engagement and feedback.

The results and feedback from information disclosure, public consultation as well as comments received through the Grievance Mechanism will be documented and reported as appropriate. Summary reports will contain details about suggestions or concerns raised by stakeholders and how their comments have been taken into account.

Engagement level of stakeholders will be monitored by a set of indicators, which shall include the following items:

- Number of communications;
- Type of communications;
- Frequency of communications;
- Number of valid complaints (and number rejected as unclear, problematic or dubious);
- Type of complaints;
- Sources of complaints;
- Number of resolved complaints;
- Average time for resolution of complaints;
- Number of presentations on environmental, social and economic status of the company;
- Number of mass media articles and / or announcements;

- Number of stakeholders involved per action;
- Level / degree of involvement for each stakeholder;
- Number of visitors on the websites; and
- Number of requests for information via websites.

A clear record of all these indicators shall be kept. Where possible the indicators shall be differentiated by gender and type of stakeholder.

Depending on monitoring outcomes, the central Project level SEP, to be prepared by the Project, as a living document will be periodically updated. Furthermore, relevant outcomes will be fed back to the sub-component level to allow for adequate updating and adaptation of the sub-component SEP (see Figure 4-5).

The engagement activities will be evaluated against the framework included in this SEF.

As the monitoring of the stakeholder engagement process may reflect any significant stakeholder concerns about the Project, the input will be used for the monitoring activities related to the E&S performance management. The E&S performance for the Project will be monitored and periodic reports will be provided to lenders. Input from stakeholder engagement and consultation activities play therefore a vital role in the E&S performance monitoring and evaluation.

5. ORGANISATIONAL PLANNING

To ensure successful stakeholder engagement on a Project level as well as for individual sub-components, a number of organisational planning elements are required. Responsibilities need to be clearly assigned, while ensuring adequate capacities are given. In addition, sufficient resources need to be made available for the stakeholder engagement activities, including personnel and costs. Timing is to be defined for all organisational activities and following planning with regards to stakeholder engagement activities.

The Project shall be responsible to ensure adequate stakeholder engagement and grievance management throughout the entire Project lifecycle. Similarly, on a sub-component level, relevant responsibilities need to be assigned ensuring adequate capacities. In line with this, the Project developer will coordinate all aspects related to the planning and implementation of the central Project level stakeholder engagement according to all relevant national and international standards. The Project developer will review resources in place, identify and communicate needs for additional resources dedicated to stakeholder engagement and grievance management activities.

Clear definition and communication of roles and responsibilities shall be assigned and resourced by qualified staff to be responsible for specific tasks, and supervise the assigning of relevant roles on a sub-component level, as part of the implementation of this SEF. Where applicable, the Project will raise the need for technical assistance to ensure the adequate implementation of this SEF if required. Key responsibilities on a sub-component level are to be clearly assigned and communicated to the overall Project.

The key responsibilities for stakeholder engagement management on a Project level are described below and to be integrated in the Project level SEP. To continuously reflect the changing needs of the stakeholder engagement process, it is possible that these roles and responsibilities change over time and need to be adjusted adequately.

Communication and Regulatory Management Responsibilities

- Overall SEF implementation: development of subsequent SEP(s) Project and sub-component level;
- Overall Project and sub-component level SEP implementation: monitoring and reporting;
- Provision of access to relevant information about the project;
- Public debates: organize public debates related to the permitting processes and project compliance;
- Meetings with local authorities and official correspondence: organize meetings and correspondence in order to offer information about the project, request feedback, identify concerns and obtain permits;
- Meetings with national authorities and official correspondence: organize meetings and correspondence in order to offer information about the project, request feedback, identify concerns and obtain permits.
- Public consultations: organize public consultations with the local community in order to provide information and consult interested parties regarding the project; include resettlement and land acquisition aspects;
- Focus group meetings: organize focus groups in order to understand the community needs and identify the needs of vulnerable groups; include resettlement and land acquisition aspects;
- Mass media coverage/ Press releases/ Information disclosure: offer relevant information to the mass media and third parties;
- Grievance Mechanism: Grievances received or identified, including filling out case details (General Information, Reported Party and Incident or claim Description/consequences sections) in the Grievance Analysis Report form;
- Maintenance of central log of all grievances ensuring it is kept up to date with current status;
- Preparation of minutes of Grievance Committee Meetings, formally recording all decisions made by completing the Analysis, Analysis Results and Decision sections in the Grievance Analysis Report form for the case;
- Preparation of responses to grievance raisers and agree content with other members of the Grievance Committee;
- Issue all responses to grievance raisers and ensure the Management Team are informed.

Community Liaison Responsibilities

- A direct point of contact between the Project and affected communities and individuals;
- On-going communication to public and private stakeholders about the Project status and activities, expected E&S impacts and planned mitigation measures;
- Gather feedback from stakeholders to feed into the Project's ESIA and design process;
- Receive feedback received from the affected communities.

It has to be noted that the above lists describe the stakeholder engagement and Grievance Mechanism-related responsibilities and it depends on the Project's management to decide how these will be allocated e.g. same employee, dedicated experts, group of employees, management etc. Generally, the Project is to ensure adequate resourcing is available for the implementation of the SEF including the conduct of all related responsibilities listed above. To enable the implementation of the SEF, the team needs to be staffed sufficiently and costs are to be planned accordingly. For example, this includes a community liaison officer who is full time assigned to the various applicable

responsibilities. Further costs for implementing the SEF and later on the Project level SEP(s) include all budgetary requirements for conducting and facilitating engagement activities (e.g. venue, refreshments, transportation costs, printing costs for leaflets, etc.). The implementation of disclosure as well as visibility and awareness campaigns include costs for printing of posters and dissemination. In addition, for additional stakeholder engagement related activities external support may be hired (e.g. development and implementation of resettlement action plan, indigenous people's expert, local partners, etc.). Therefore, adequate planning for personnel, budgeting and timing is to be defined in the Stakeholder Engagement Action Plan.

On a sub-component level, the same responsibilities are to be applied as listed above. They will refer to sub-component level stakeholder engagement activities only and feed into the overall Project SEP. Each sub-component level SEP is to clearly define the interaction with the overall Project level stakeholder engagement management, including feedback mechanisms and possible overlap of areas of interaction, engagement, grievance management, monitoring activities, etc.

6. NEXT STEPS

In line with the principles outlined in this SEF, the Project will develop an overall SEP prior to any construction activities. Similarly, all sub-components are to develop their own SEP to ensure adequate stakeholder engagement at a sub-component level adhering to the overall Project principles for stakeholder engagement outlined in this SEF. The basic structure included in Appendix A can be used in conjunction with the detailed guidance included in the SEF for both, the development of the Project level SEP as well as sub-component level SEPs. The central Project SEP shall include specifications on interaction with sub-component level stakeholder engagement activities and vice versa. A dynamic dialogue between the different levels is expected to ensure effective management and implementation of disclosure and consultation activities.

APPENDIX A EXAMPLE STRUCTURE OF SEP

EXAMPLE STRUCTURE OF A STAKEHOLDER ENGAGEMENT PLAN (SEP)

1. INTRODUCTION

Brief description of the Project (location, maps, area of influence, sensitive areas, communities, project components, activities, etc.) including purpose and objective, the stage of the project, relevance of stakeholder engagement for the overall project and this specific stage.

2. STAKEHOLDER ENGAGEMENT ACTIVITIES TO DATE

Brief summary of previous Stakeholder Engagement activities including disclosure (providing an overview of the type of information disclosed) and consultation (informal and formal). Include a link to where more detailed information to the activities to date can be found.

3. STAKEHOLDER MAPPING

Identification of key stakeholders relevant to the Project who need to be engaged in the disclosure and consultation process. Stakeholders should be individuals and groups that are (i) affected by the project) and (ii) may have an interest in the project. Specific emphasis is to be put on the identification and analysis of vulnerable groups.

4. STAKEHOLDER ENGAGEMENT PROGRAM

Description of the purpose and objective of the stakeholder engagement program including the main goals and the envisaged timeline for the planned activities in light of the various project stages.

4.1 Information Disclosure

4.2 Stakeholder Consultation

4.3 Timelines

4.4 Grievance Management

5. RESOURCES AND RESPONSIBILITIES

Indication of resources for implementing the SEP including roles and responsibilities, budgetary requirements and required capacities (where relevant capacity building measures).

6. MONITORING AND REPORTING

Description of M&E and reporting plans including potential third party involvement, interaction with sub-component level and external parties.

APPENDIX B EXAMPLE GRIEVANCE FORM

PUBLIC GRIEVANCE FORM

Reference No. (assigned by *[Insert Project Implementing Party's name]*:

Preferred language for communication	☐ **Kinyarwanda** ☐ **English** ☐ **Kiswahili** ☐ **French** ☐ **Other, please specify:** _____

Please enter your contact information and grievance. This information will be dealt with confidentially.

Please note: If you wish to remain anonymous, please enter your comment/grievance in the box below without indicating any contact information – your comments will still be considered by

Full Name	
Anonymous submission	☐ **I wish to raise my grievance anonymously** ☐ **I request not to disclose my identity without my consent**
Please mark how you wish to be contacted (mail, telephone, e-mail).	☐ **By mail (please provide mailing address):** _____ ☐ **By telephone (please provide telephone number):** _____ ☐ **By e-mail (please provide e-mail address):** _____

Description of incident or grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?

Date of incident/grievance: _____	☐ **One time incident/grievance (date _____)** ☐ **Happened more than once (how many times? _____)** ☐ **On-going (currently experiencing problem)**

What would you like to see happen to resolve the problem?