



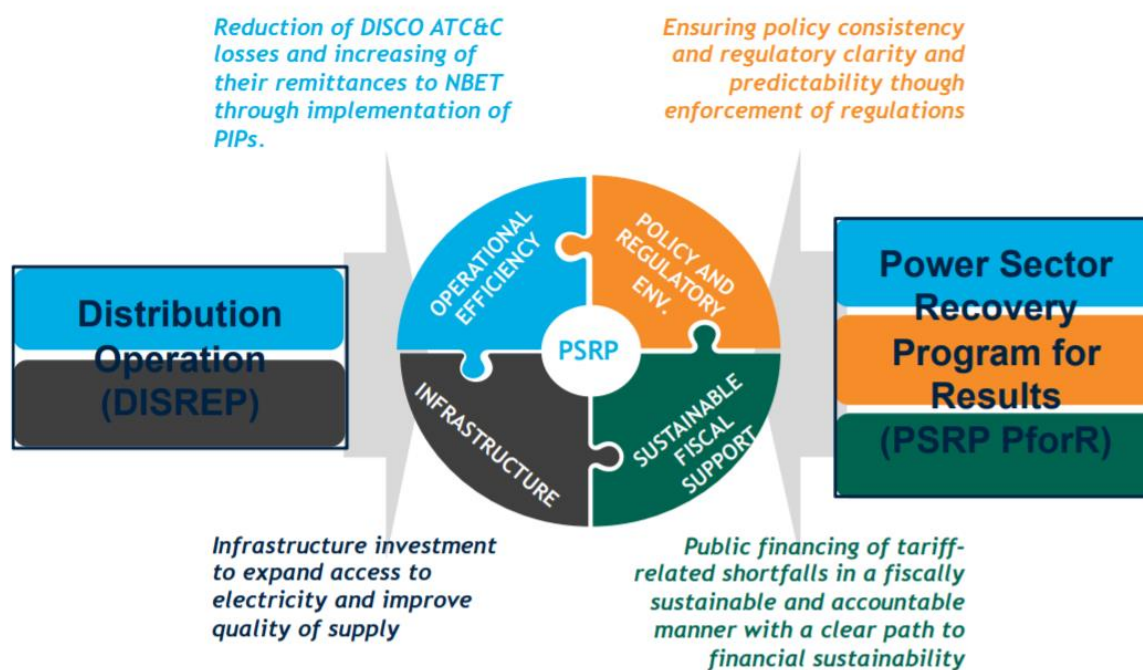
# STAKEHOLDER ENGAGEMENT PLAN



FOR

## NIGERIA DISTRIBUTION SECTOR RECOVERY PROGRAM DISREP

{P172891}



**Draft Report  
October 2020**

## Table of Contents

LIST OF TABLES .....	iv
LIST OF FIGURES .....	iv
LIST OF ACRONYMS AND ABBREVIATIONS .....	v
EXECUTIVE SUMMARY .....	1
CHAPTER ONE .....	3
1.0 INTRODUCTION.....	3
1.1 Background Information .....	3
1.2 Purpose of the Project .....	5
1.3 Objectives of the Stakeholders Engagement Plan.....	6
1.4 Key Results Areas and Disbursement Linked Indicators (DLIs).....	6
1.5 Stakeholder Engagement to date and Key Feedback received during Stakeholder Consultations.....	8
1.6 Principles for effective stakeholder engagement .....	9
1.7 Structure of Stakeholder Engagement Plan.....	10
CHAPTER TWO .....	11
2.0 STAKEHOLDER ENGAGEMENT REGULATORY CONTEXT .....	11
2.1 Stakeholder Engagement Regulatory Context .....	<b>Error! Bookmark not defined.</b>
2.2 Key National Legal Provisions for Environmental and Social Safeguards and Citizen Engagement.....	11
2.2.1 The Freedom of Information Act.....	11
2.2.2 Constitution of the Federal Republic .....	11
2.2.3 Nigerian Environmental Assessment Law .....	11
2.2.4 Other Legal Provisions on Stakeholder Engagement and Disclosure .....	12
2.3 World Bank Environmental and Social Standard on Stakeholder Engagement .....	12
CHAPTER THREE .....	13
3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS .....	13
3.1 Program Stakeholder identification and Analysis.....	13
3.2 Stakeholder Categorization .....	13
3.2.1 Implementing Agencies .....	13
3.2.2 Affected Parties.....	15
3.2.3 Interested Parties .....	16
CHAPTER FOUR.....	18
4.0 STAKEHOLDER ENGAGEMENT PLAN (THROUGHOUT PROJECT LIFE-CYCLE).....	18
4.1 Stakeholder Engagement Plan.....	<b>Error! Bookmark not defined.</b>
4.2 Engagement Methods and Tools .....	18
4.3 Identifying Themes to Discuss with Stakeholders .....	22

4.4	Description of Engagement Methods .....	23
4.5	Institutional Stakeholders Engagement .....	31
4.6	Consultation with Stakeholders.....	34
4.7	Disclosure and Participation Plan .....	34
4.7.1	Disclosure Mechanism.....	35
4.7.2	Process for Disclosure of Information .....	35
4.8	Timetable for Disclosure .....	36
CHAPTER FIVE .....		38
5.0	RESOURCES AND RESPONSIBILITIES .....	38
5.1	Introduction .....	38
5.1.1	External Resources.....	39
5.1.2	Training.....	39
5.1.3	Financial Resources .....	40
5.1.4	Budget.....	40
CHAPTER SIX.....		41
6.0	GRIEVANCE MANAGEMENT .....	41
6.1	Grievance Redress Mechanism (GRM) .....	41
6.2	Grievance Resolution Framework.....	42
6.3	DISREP Grievance Escalation Process .....	43
6.4	Grievance logs.....	44
6.5	Screening, Prioritization and Assignment .....	44
6.6	Monitoring and reporting on grievances .....	45
6.7	Points of contact .....	<b>Error! Bookmark not defined.</b>
6.8	World Bank Grievance Redress System .....	45
CHAPTER SEVEN .....		47
7.0	MONITORING AND REPORTING .....	47
7.1	Monitoring and Reporting .....	<b>Error! Bookmark not defined.</b>
7.2	Reporting.....	47
7.3	Stakeholder Involvement in Project Monitoring .....	48
7.4	Ongoing Reporting to Stakeholders .....	48
7.5	Training .....	49
ANNEXES.....		50
ANNEX 1: Proposed Budget Line Items for Stakeholder Engagement .....		50
ANNEX 2: NERC Customer Classification Index .....		50
ANNEX 3: PROPOSED TRAINING OUTLINE .....		52

## LIST OF TABLES

Table 4.1: Stakeholder group consultation methods	21
Table 4.2: Engagement Techniques	24
Table 4.3: Methods/Tools for Information Provision, Feedback, Consultation and Participation	26
Table 4.4: Consultation methods for vulnerable groups	31
Table 4.5: Stakeholder Engagement Among the Implementing Agencies, Partners and DISREP Coordinating Agency under the IPF AND TA components	33
Table 4.6: Stakeholder Engagement and Disclosure Methods	36
Table 5.1: Organizational Roles and Responsibilities .....	38
Table 5.2: Resources facilitation.....	<b>Error! Bookmark not defined.</b>
Table 6.1: Grievance priority classification.....	45
Table 7.1: Key Performance Indicators by Project phase.....	47
Table 7.2: Outline of Reports to Stakeholders.....	49

## LIST OF FIGURES

Figure 1.1: FGN's PSRP framework and WB's support in alignment to PSRP.....	4
Figure 1.2: Theory of Change (Result Chain) And Causal Link Of DISREP Activities.....	8
Figure 1.3: The Process Flow of Stakeholder Engagement.....	10
Figure 4.1: Important questions for preparing a message.....	19
Figure 4.2: Checklist to guide in developing clear messages .....	19
Figure 4.3: Re-configured existing coordination structures in line with the Nigeria DISREP .....	32
Figure 6.1: Grievance Mechanism flowchart.....	41

## LIST OF ACRONYMS AND ABBREVIATIONS

DISREP	Nigeria Distribution Sector Recovery Program
AoI	Area of Influence
CDA	Community Development Association
CCT	Conditional Cash Transfers
CSOs	Civil Society Organizations
CLO	Community Liaison Officer
DLI	Disbursement-linked indicator
DLR	Disbursement-linked results
DISCO	Distribution Company
ES	Executive Summary
ESS	Environmental and Social Standards
ESF	Environmental and Social Framework
FGD	Focus Group Discussions
FPIC	Free Prior Informed Consent
GRM	Grievance Redress Mechanism
GO	Grievance Officer
IDP	Internally Displaced Person
IVA	Independent Verification Agent
LGA	Local Government Area
LRP	Livelihood Restoration Plan
MDAs	Ministries, Departments and Agencies
MPA	Multi-phase Programmatic Approach
MYTO	Multi Year Tarriff Order
FGN	Federal Government of Nigeria
FME <sub>nv</sub>	Federal Ministry of Environment
FMoF	Federal Ministry of finance Budget and Planning
FMoP	Federal Ministry of Power
NGO	Non-Governmental Organization
PAF	Project Affected Families
PAP	Project Affected Person
PDO	Project Development Objective
PID	Project Identification Document
PforR	Program for Result
VDC	Village Development Committee
WBG	World Bank Group
WDR	World Development Report

## EXECUTIVE SUMMARY

The World Bank is supporting the Federal Government of Nigeria's comprehensive reform efforts in the Power Sector through the proposed large integrated programmatic engagement starting with a Power Sector Recovery Program (PSRP) PSRP program for results (PforR) operation. The programmatic engagement involves a series of integrated operations under two streams, PSRP PforRs and Distribution Sector Recovery Program (DISREP) (Distribution PforRs), to holistically address the sector issues. The PSRP PforRs will help establish policy, regulatory, contractual and financing conditions for power sector companies to improve performance while the proposed Distribution Sector Recovery Program (DISREP) and its additional financing will support improvement of DISCOs operational performance, service delivery and governance.

Specifically, the DISREP is a hybrid operation, combining Program for Results (PforR), Investment Project Finance (IPF) and Technical Assistance (TA) components. The PforR component will provide funding to DISCOs for the implementation of critical elements of their Power Improvement Plan (PIPs) through the on-lending of World Bank funds to DISCOs.

For the effective implementation of the Nigeria DISREP program, including the activities listed under the IPF and TA components, there is a need for open and inclusive engagements/dialogues with stakeholders, Project Affected Entities (PAEs), and other interested parties. Stakeholder engagement is a critical process that identifies the procedures for the proponent to map, identify, communicate and engage with people affected by its decision and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It is an inclusive process that is required throughout the lifecycle of project implementation, commencing as early as possible. Participatory approaches in project planning and implementation enhance project policy, ownership, sustainability and also empowers targeted beneficiaries.

The **Program Development Objective (PDO)** is to improve financial and technical performance of the electricity distribution companies. Consistent with the PSRP, the DISREP seeks to achieve this objective by supporting the distribution sector to invest in the infrastructure and operational improvements required to turn around their technical and financial performance, in line with approved PIPs.

Specific objectives of this SEP are;

- To map and identify the key stakeholder groups;
- To develop the procedure for effective stakeholder engagements throughout the Program's lifecycle; and
- To identify resources needed and timeframe to achieve effective participation in each stage of the process and describes the stakeholder engagement process.

Applicable *National Legal Provisions* and Regulations for Environmental and Social Safeguards and Citizen Engagement include; Constitution of the Federal Republic of Nigeria (1999) as amended, The Freedom of Information Act (2011), Nigerian Environmental Impact

Assessment (EIA) Act Cap E12, LFN 2004, The Nigerian Urban and Regional Planning Act, Cap N138, 2004. Applicable *World Bank Policies include*; The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10.

The level of success and sustainability of the DISREP program is crucial and dependent upon a proper Stakeholder Engagement Plan and its associated activities taking place.

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

1. Implementing Agencies (e.g., MDAs)
2. Affected Parties (beneficiaries, PAPs, etc.)
3. Interested Parties (local population who can benefit indirectly, etc.)

In keeping with the applicable reference framework and the expectations of the stakeholders, the project will undertake regular engagement with the key stakeholder groups identified through the life of the project utilizing various engagement methods identified for the purpose of this project such as; focus group discussions, semi-structured and structured interviews and questionnaires, open public meetings, and information disclosure.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within the DISREP PMU.

In compliance with applicable local and national laws and essentially the World Bank's OP 4.01, a project-specific mechanism is being set up to handle complaints and issues. This process (referred to as the Grievance Redress Mechanism) would be specially designed to collect, collate, review and redress stakeholders' concerns, complaints and grievances. The GRM will be accessible and understandable for all stakeholders in the project and for the entire project life.

Monitoring and evaluation of the stakeholder process is considered vital to ensure the DISREP can respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. A series of key performance indicators for each stakeholder engagement stage have been developed and outlined in Table 7.1.

## CHAPTER ONE

### 1.0 INTRODUCTION

#### 1.1 Background Information

The World Bank is supporting the Federal Government of Nigeria (FGN) comprehensive reform efforts in the Power Sector through the proposed large integrated programmatic engagement starting with a Power Sector Recovery Program (PSRP) PSRP program for results (PforR) operation. The programmatic engagement will involve a series of integrated operations under two streams – PSRP PforRs and Distribution Sector Recovery Program (DISREP) (Distribution PforRs), to holistically address the sector issues (Figure 1). The PSRP PforRs will help establish policy, regulatory, contractual and financing conditions for power sector companies to improve performance while the proposed Distribution Sector Recovery Program (DISREP) and its additional financing will support improvement of DISCOs operational performance, service delivery and governance.

As part of efforts to bridge the gap between the demand and supply of electricity within the country the Federal government launched the Electric Power Sector Reform Act in 2005 to improve the performance of the electricity sector. This Act unbundled the then government-owned electricity utility (the Power Holding Company of Nigeria (PHCN) into Power Generation (GenCos), Transmission (TCN) and Distribution Companies (DISCOs. The Act also created and empowered the electricity sector regulator (The Nigeria Electricity Regulatory Commission – NERC) as well as the Bulk Electricity Trader (NBET).

The ambitious step towards the revamping of the power sector was stalled by high losses (both technical and non-technical) occasioned by low collections, coupled with average tariffs below cost reflective level, accounting for an annual financial deficit in the sector in 2019 of approximately NGN 592 billion (USD 1.65 billion<sup>5</sup>). This translates into the inability of the DISCOs to meet their remittances to NBET under the Vesting Contracts (the estimated average remittance was about 29 percent for 2018). The Federal Government identified the need to coordinate the interventions geared towards economic recovery. To achieve this objective, the Federal Government launched the Power Sector Recovery Program (PSRP) in March 2017. PSRP relies on policy and regulatory environment, network infrastructure, operational efficiency, and financial sustainability to achieve its objective.

The inability of the DISCOs to meet their financial obligations to NBET also affects the other components of the chain (TCN and the GenCos). To ultimately improve the revenue collection of the DISCOs it is necessary to initiate and implement programmes that will Reduce the current extremely high ATC&C losses, improve revenue collection, increase the number of customers connected to their network and thus increase revenues to be received and remitted to NBET as well as their credit worthiness.

Having identified the DISCOs as the major actors upon which the financial viability of the entire sector depends, NERC has issued instructions requiring all DISCOs to submit a Performance Improvement Plan (PIP) as part of efforts towards achieving the objectives of the PSRP. The PIP is designed to “provide a framework for performance improvement and



monitoring in the 2020-2024 period” and will help NERC monitor and sustain improvements in operational performance in;

- i Electricity supply to customers
- ii Commercial operations and
- iii Management of corporate resources.

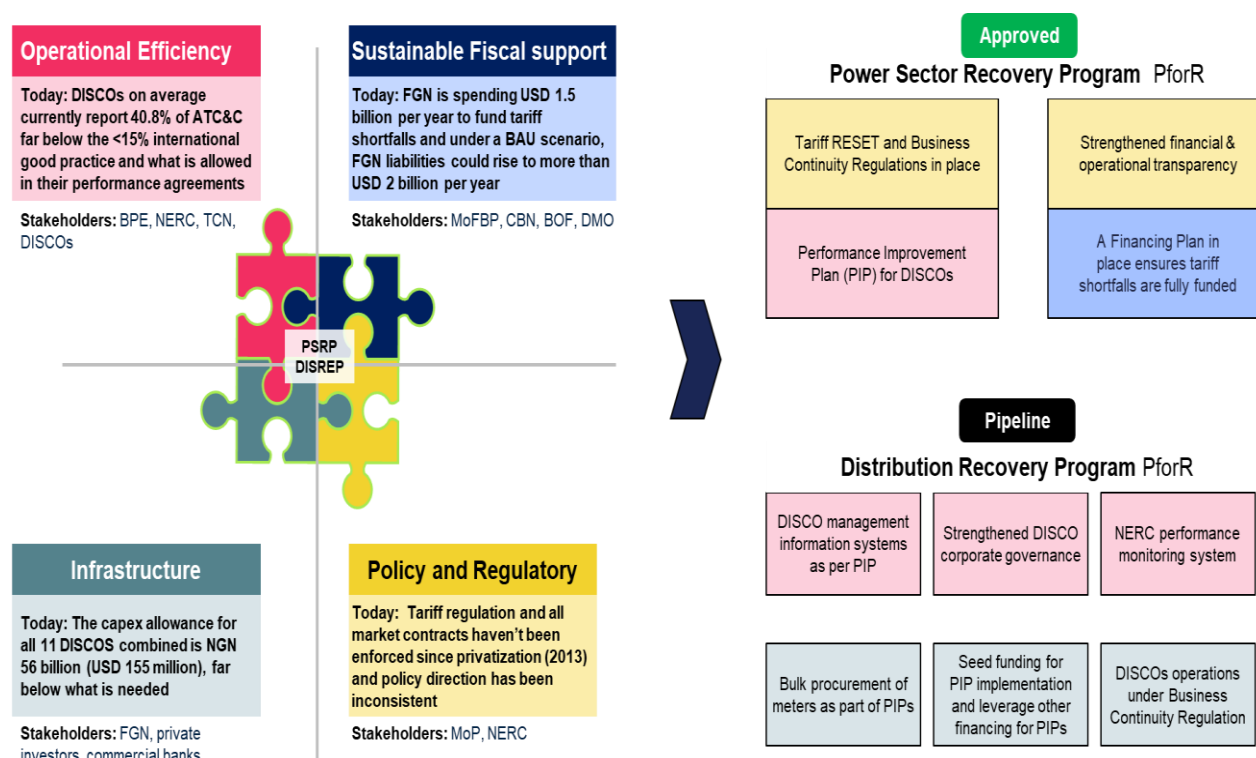


Figure 1.1: FGN's PSRP framework and WB's support in alignment to PSRP

The DISREP operation supports DISCOs in their implementation of approved PIPs and NERC in their oversight of the performance of the distribution sector.

The DISREP is a hybrid operation, combining Program for Results (PforR), Investment Project Finance (IPF) and Technical Assistance (TA) components. The PforR component will provide funding to DISCOs for the implementation of critical elements of their PIPs through the on-lending of World Bank funds to DISCOs.

The IPF component will provide additional support to DISCOs PIP implementation through the bulk procurement of customer meters in line with DISCOs PIP meter roll-out plans. The IPF component will also fund the procurement and commissioning of a DAP within NERC to assist them in their role of electricity network regulator and the agency responsible for oversight of the distribution sector and DISCO operations and performance.

DISREP TA will support the design of a power consumer assistance fund in order to ensure that the most vulnerable Nigerian power consumers are not impacted by changes in distribution sector operations and tariff structures.

TA will also be provided for implementation support for DISCOs as well as capacity building to the DISCOs and to the MoP with a focus on the evolution of the distribution sector and associated changes in sector commercial operations and business models and on how to address

the gender gap in electricity access in Nigeria. Together, the DISREP components will support the successful implementation of PIPs and, in-turn, address the infrastructure and operational improvement aspects of the PSRP, contributing to the overall sector viability and sustainability going forward.

For the effective implementation of the Nigeria DISREP program including the activities listed under the IPF and TA components there is need for open and inclusive engagements/dialogues with stakeholders, Project Affected Persons (PAPs), and other interested parties. Stakeholder engagement is a critical process that identifies the procedures for the proponent to identify, communicate and engage with people affected by its decision and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It is an inclusive process that is required throughout the lifecycle of project implementation, commencing as early as possible. Participatory approaches in project planning and implementation enhance project policy, ownership, sustainability and also empowers targeted beneficiaries.

This SEP is designed to fulfil the program's requirements as stated in ESS10 of the ESF. Its goal is to promote and support inclusive and transparent participation of all stakeholders in the design and implementation of the DISREP. Where properly designed and implemented, stakeholder engagement supports the development of strong, constructive and responsive relationships that are important for successful management of the entire project's. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

The Stakeholder Engagement Plan (SEP) describes the methods of engagement with stakeholders throughout the lifecycle of the project. It identifies information and types of interaction to be conducted in each phase of the project, considers and addresses stakeholders' communication and physical accessibility challenges, and includes any other stakeholder engagement required.

The Stakeholder Engagement will involve the following steps:

- stakeholder identification and analysis;
- proper documentation of all stakeholders' plans on how the engagement with stakeholder will take place;
- disclosure of information;
- consultation with stakeholders;
- addressing and responding to grievances, and
- reporting to stakeholders.

## **1.2 Purpose of the Project**

The **Program development objective (PDO)** is to improve financial and technical performance of the electricity distribution companies. Consistent with the PSRP, the DISREP seeks to achieve this objective by supporting the distribution sector invest in the infrastructure and operational improvements required to turn-around their technical and financial performance, in line with approved PIPs.

The following outcome indicators will be used to measure achievement of the PDO:

- (i) PDO Indicator 1: Percentage of metered customers' increases;
- (ii) PDO Indicator 2: Annual electricity billed for increases; number of grids with improved stability, reliability and/or capacity to reduce technical losses
- (iii) PDO Indicator 3: Annual collection of billed electricity increases;
- (iv) PDO Indicator 4: Annual verification of DISCOs compliance with Code of Corporate Governance.

### **1.3 Objectives of the Stakeholders Engagement Plan**

The objective of the Stakeholders Engagement Plan is:

- To develop the procedure for effective stakeholder engagements throughout the Project's lifecycle;
- To identify the key stakeholder groups; and
- To identify resources needed and timeframe to achieve effective participation in each stage of the process and describes the stakeholder engagement process.

### **1.4 Key Results Areas and Disbursement Linked Indicators (DLIs).**

The DISREP PforR component will provide funds for the early stages of PIP implementation to improve DISCOs technical and financial performance, enabling them to raise the private financing required to fully achieve their PIP targets. The PforR component of the operation will provide World Bank funds to BPE, as the designated representative of the FGN, in order to on-lend to DISCOs. DISREP PforR funding will be disbursed following the verified achievement of disbursement-linked indicators (DLIs), which have been developed in partnership with BPE and DISCOs and represent key metrics in the performance turn-around of DISCOs' operations.

Within this framework, the program by design is structured to be flexible, fast disbursing along the following three (3) key result areas:

The proposed Key Results Areas and DLIs for the program are as follows:

**Result Area 1.** improved DISCO operational performance The DLIs for the program in result area is as follows:

- DLI#1: Number of distribution transformer-level meters installed by DISCOs
- DLI#2: Number of new connections by DISCOs
- DLI#3: Kilometres of distribution lines rehabilitated by DISCOs

**Result Area 2.** Enabling diversification of commercial options for DISCOs to supply their demands. The DLIs for the program in result area is as follows:

- DLI#4: Increased collection efficiency by DISCOs
- DLI#5: Meeting the demand supply gap projected in DISCOs PIPs9

**Result Area 3.** (3) strengthened corporate governance and transparency. The DLIs for the program in result area is as follows:

- DLI#6: Compliance with NERC Corporate Code of Governance by DISCOs
- DLI#7: Implementation of Management Information Systems (MIS) by DISCOs

**In addition to the core PforR instrument above,** the proposed DISREP will include two Investment Project Financing (IPF) components (USD 170 million) and two Technical Assistance (TA) components (30 million): Figure 1 below shows the theory of change (results chain) with the causal link between these DISREP activities, outputs, short-term outcomes, and longer-term outcomes.

(a) IPF Component: NERC Data Aggregation Platform (USD 50 million). To support NERC in addressing problems of inadequate data availability, inconsistent data quality, and irregular reporting of the sector operators, compromising the NERC mandate on performance monitoring and oversight of DISCOs, the IPF1 project will support the scoping and implementation of a comprehensive Data Aggregation Platform (DAP) within NERC.

(b) TA Component 1 (TA1): DISREP Implementation Support (USD 15 million). To support Program implementation, the TA1 would include the establishment of a Project Management Unit (PMU) in BPE (USD 10 million) to assist with the functions of the PforR Implementing Agency. In addition, the TA1 would include capacity building for implementation of measures identified in the Program Action Plan (e.g. strengthening of Safeguards, financial management, procurement capacity).

(c) TA Component 2 (TA2): (USD 15 million).

(i) Pillar I: Capacity Building (USD 12 million). The Pillar I will support capacity building in the MoP as well as DISCOs. This would include development of the policy for the Roadmap on electricity sector market evolution along with sector policies and regulation with the aim of developing a guideline/framework for investment in the distribution. In addition, Pillar I would support DISCOs capacity building and change management programs regarding the application of new business models and commercial operations in DISCO services (e.g. sub-franchising, premium customers, revenue protection schemes, etc.)

(ii) Pillar II: Design of a Consumer Assistance Fund (USD 3 million). Improvements in DISCOs, and overall sector performance, are expected to support NERC efforts to review the power sector tariffs in order to reach a cost-reflective level. Whilst necessary for the stable financial performance of the power sector in the long-term, in the near/medium-term increased tariffs may negatively impact on some of the most vulnerable consumers. In order to limit to the largest extent possible these negative impacts, Pillar II will support the analysis of a Social Safety Net called the “Consumer Assistance Fund”.

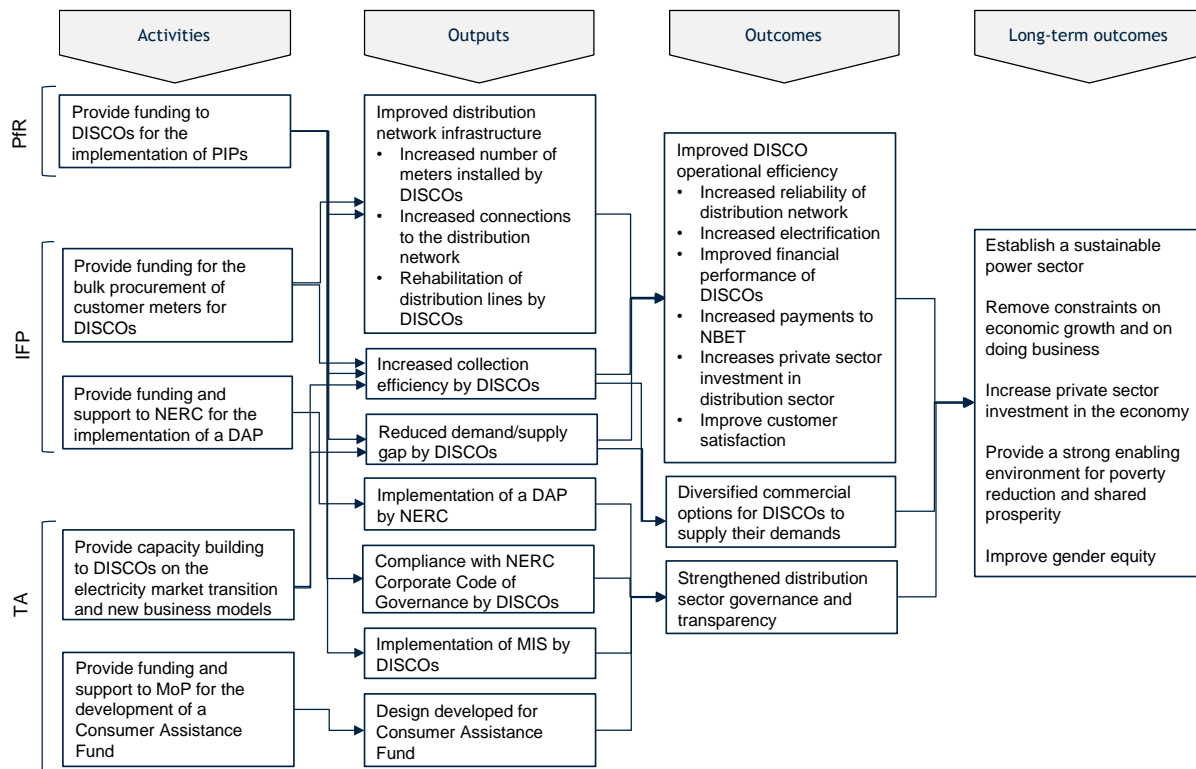


Figure 1.2: Theory of Change (Result Chain) And Causal Link of DISREP Activities

Full attainment of the project objectives hinges on the following critical assumptions:

- Full PIP implementation combined with full Multi Year Tariff Order (MYTO) implementation is sufficient to achieve sector sustainability;
- Adherence to NERC Code of Corporate Governance is sufficient to ensure good governance by DISCOs.

### 1.5 Stakeholder Engagement to Date and Key Feedback

The ministries and institutions and participating implementing agencies at the federal and state levels were consulted to inform them about the project including the World Bank ESF and general safeguard concerns that need to be mainstreamed into the project. Their support to the project was also solicited along with a discussion on needs and capacities. Subsequently, a virtual stakeholder workshop was held on the 5<sup>th</sup> of October 2020 taking cognisance of the current COVID 19 pandemic and social distancing restrictions, where stakeholders from the existing implementing agencies in the result areas being the DISCO, NERC, TCN were convened to discuss and make further inputs on the instruments of the project like the Stakeholders Engagement Plan, and the Labour Management Procedures and Environmental.

The inputs received in the course of interaction and completed questionnaire administration were duly incorporated.

Participants in the forum and Respondents are aware of the DISREP project and above Fifty percent admitted that the project will impact them positively. Majority of the DISCO respondents professed to have carried out/ participated in similar stakeholder engagement

activities project with the World Bank Team and over fifty percent stated that those projects were successful.

Engagement of Stakeholder has been seen to be an important tool for their project. About 75% of respondents indicated their most effective means of communication has been through the use of Radio & TV, Newspaper, Slots/programs, official correspondence, reports and use of town crier in the village areas while the preferred and effective method of engagement have been interviews, group discussion and having a meeting. There was, however, no consensus on a single methodology for every form of stakeholder engagement.

Areas of concerns were mainly with respect to managing political influence in a productive manner and weak legal frameworks to support stakeholder engagement. Others include the reporting mechanism in transforming of the existing programs into the new Nigeria DISREP. Both concerns were addressed as part of the basis for the development of the Stakeholder Engagement Plan.

### 1.6 Principles for effective stakeholder engagement

The program's Stakeholder Engagement Plan (SEP) shall be informed by a set of principles defining its core values underpinning interactions with identified stakeholders. This principle shall align with the requirements of ESS10 which stipulates that meaningful stakeholder's engagement should be free of external manipulations, interference, coercion, discrimination and intimidation. Some 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 and continuous throughout the project implementation;
- **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;
- **Informed Participation and Responsiveness** involves widely publicized information among all stakeholders in appropriate format respecting stakeholders view;
- **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;
- **Trust** is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions and
- **Measurement** which is documenting the engagement process, its output and assessment.

The process flow for stakeholder engagement indicated in figure 1.2 is represented as a circle because it is constant, where lessons from past experience will then shape future planning and engagement. The process is not linear; rather it is an iterative process in which an organisation learns and improves its ability to perform meaningful stakeholder engagement while developing relationships of mutual respect, in place of one-off consultations.

## 1.7 Structure of Stakeholder Engagement Plan

The structure of the stakeholder engagement plan will be as follows;

- Introduction
- Stakeholder Engagement Regulatory Context
- Stakeholder Identification and analysis
- Stakeholder Engagement Program
- Resources and responsibilities
- Grievance Redress Mechanism
- Monitoring and Reporting

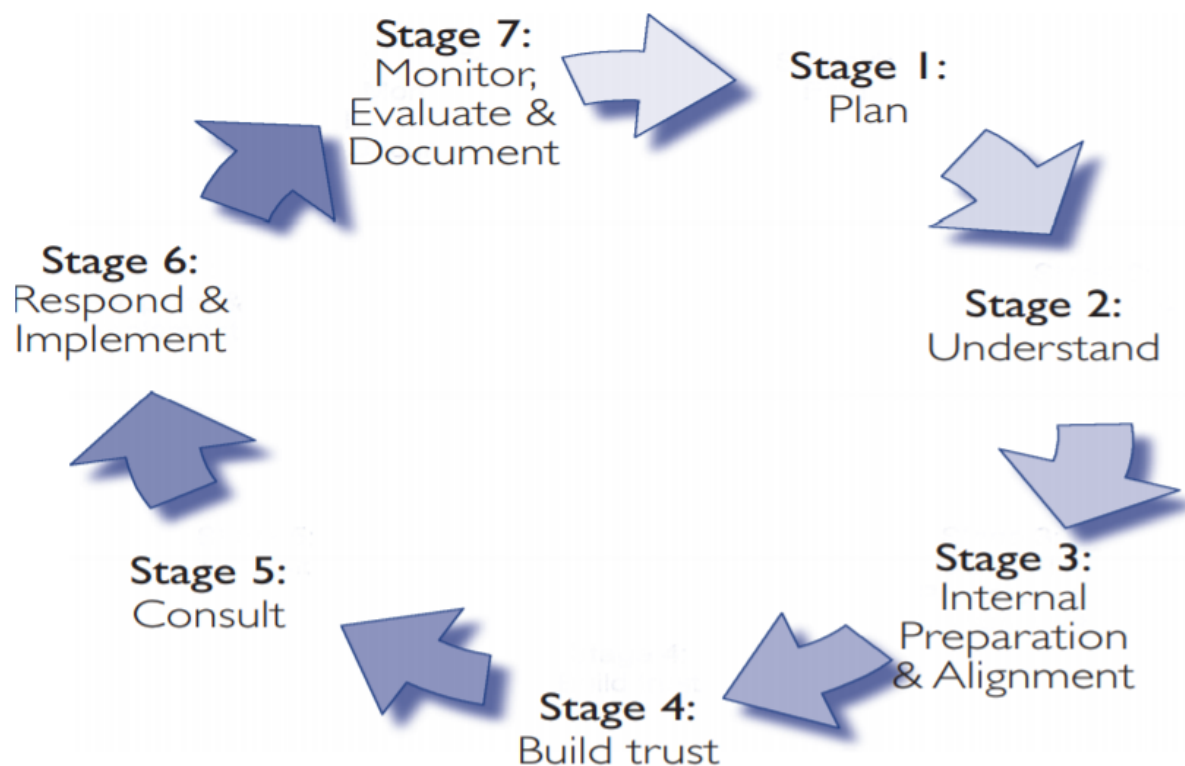


Figure 1.3: The Process Flow of Stakeholder Engagement

## **CHAPTER TWO**

### **2.0 STAKEHOLDER ENGAGEMENT REGULATORY CONTEXT**

This section presents a brief overview of the national legal provisions that necessitates citizenship engagement, disclosure of public information and adequate response to queries, concerns and grievances raised by the public on key government actions.

#### **2.1 Key National Legal Provisions for Citizen Engagement**

##### **2.1.1 The Freedom of Information Act**

The purpose of the Act is to make public records and information more freely available, provide for public access to public records and information, protect public records and information to the extent consistent with the public interest and the protection of personal privacy, protect serving public officers from adverse consequences for disclosing certain kinds of official information without authorization and establish procedures for the achievement of those objectives. This Act applies not only to public institutions but also to private organisations providing public services, performing public functions or utilising public funds. According to the Act,

- All stakeholders are entitled to access to any records under the control of the government or public institution
- Any stakeholder denied information can initiate a court proceeding to effect the release of such information
- All public institutions shall make available any records as requested by the stakeholders within a period of 7 days

##### **2.1.2 Constitution of the Federal Republic**

Chapter two of the Nigerian constitution takes socioeconomic rights of Nigerians into account.

This chapter includes that no citizen should be denied the right to environment, the right to secure and adequate means of livelihood, right to suitable and adequate shelter, the right to suitable and adequate food etc. Section 20 of the constitution also takes into account the use of resources and provides that the environment must be protected and natural resource like water, air, and land, forest and wild life be safeguarded for the benefit of all stakeholders.

##### **2.1.3 Nigerian Environmental Assessment Law**

This act provides guidelines for activities for which EIA is compulsory (such as mining operations, road development, coastal reclamation involving 50 or more hectares, etc.). It prescribes the procedure for conducting and reporting EIAs and dictates the general principles of an EIA. The EIA act enshrines that consideration must be given to all stakeholders before the commencement of any public or private project by providing for the involvement and input of all stakeholders affected by a proposed project.



#### **2.1.4 Other Legal Provisions on Stakeholder Engagement and Disclosure**

The Nigerian Urban and Regional Planning Act, Cap N138, 2004 provides that any land development plan must be disclosed to stakeholders to prove that such projects would not harm the environment or constitute nuisance to the community.

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

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", 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, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social 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 project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to 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 project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100).

For more details on the WB Environmental and Social Standards, please follow the link below:  
<https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

## CHAPTER THREE

### 3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

#### 3.1 Program Stakeholder identification and Analysis

Program stakeholders are ‘people who have a role in the Program, could be affected by the Program, or who are interested in the Program’. Project stakeholders can further be categorized as primary and secondary stakeholders. Primary stakeholders are individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly especially those who are directly affected, including those who are disadvantaged or vulnerable. Secondary stakeholders are broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them.

Thus, the DISREP Program stakeholders as indicated in figure 3.1, are defined as individuals, groups or other entities who:

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

#### 3.2 Stakeholder Categorization

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

1. Implementing Agencies
2. Affected Parties
3. Interested Parties

##### 3.2.1 Implementing Agencies

This category of stakeholders encompasses the leading agencies responsible for overseeing the successful implementation of the DISREP program. They include the:

- Office of the Chief of Staff
- Office of the Vice President
- Federal Ministry of Finance Budget and National Planning (FMoF);
- Federal Ministry of Power
- Bureau of Public Enterprises (BPE)
- Nigerian Electricity Regulatory Commission (NERC)
- Eleven Distribution Companies (DISCOs)
- Transmission Company of Nigeria (TCN).
- Nigerian Electricity Management Services Agency (NEMSA).
- The EA Department of the Federal Ministry of Environment;
- The level of engagement with implementing agency will be contingent upon their respective roles and authorities in the management of environmental and social risks.

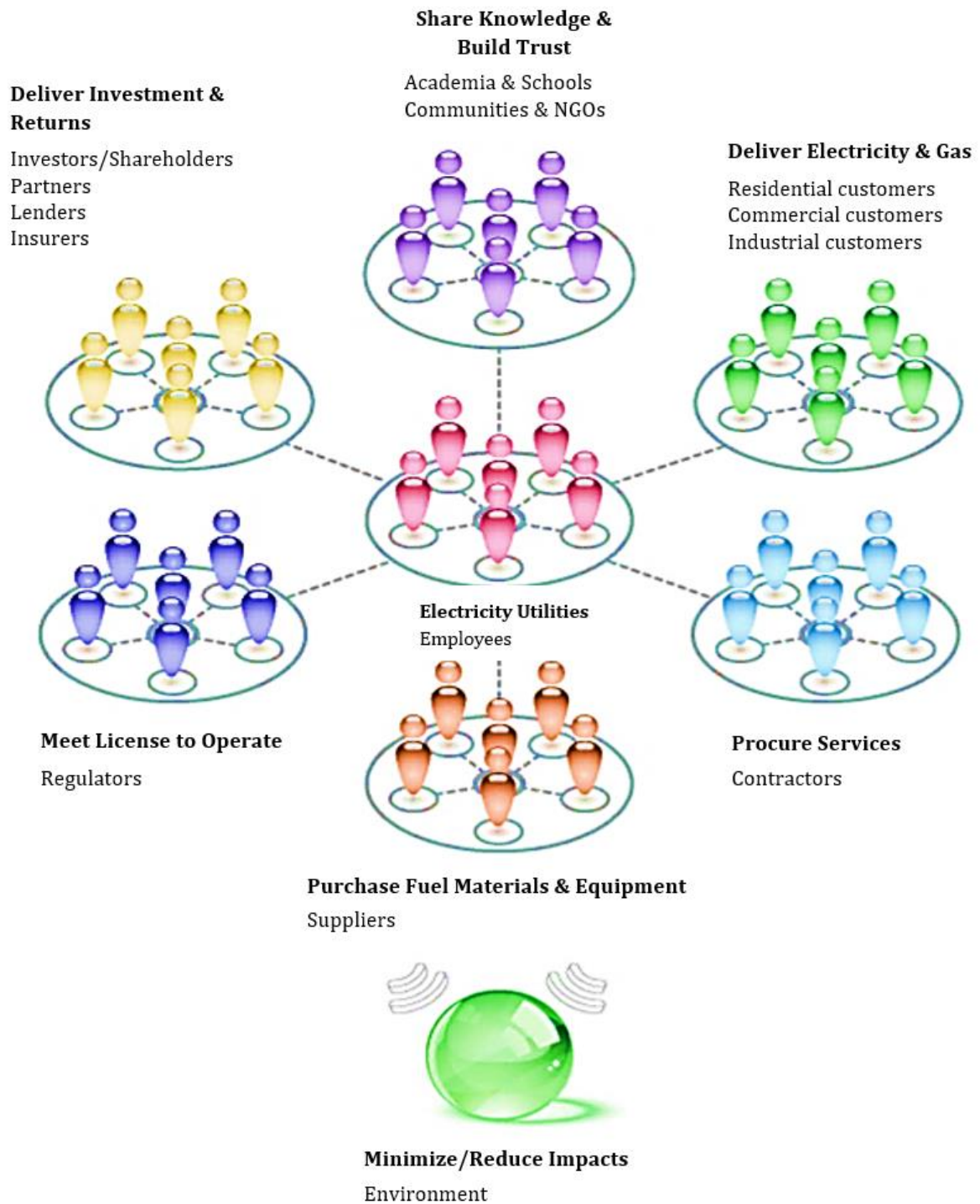


Figure 3.1: DISREP Program Stakeholders

In order to meet best practice approaches, DISREP Program implementing agencies will apply the following principles for stakeholder engagement:

**Transparency and Openness**

Clear and comprehensive disclosure of information about company decisions and activities that impact stakeholders and the public free of external manipulation, interference, coercion or intimidation.

**Inclusiveness and Sensitivity**

The will to engage, both with the general public and with affected and interested groups. Special attention is given to vulnerable groups which include rural population, people living with disabilities, women and disadvantaged youths.

**Materiality**

Access and prioritize the importance of issues that can influence a company's decisions and those of its stakeholders.

**Informed Participation and Responsiveness**

Information is provided and widely distributed among all stakeholders in an appropriate format. Respect to stakeholders' views and acceptance of appropriate scrutiny and the duty to respond to it.

**Measurement**

Documenting the engagement process, its output and assessment.

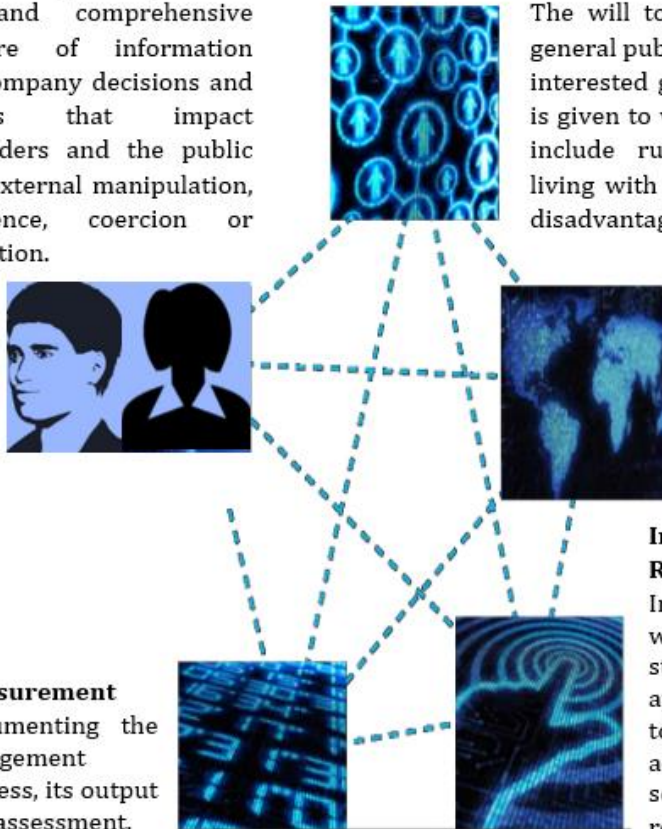


Figure 3.2: DISREP Principles for stakeholder engagement

### 3.2.2 Affected Parties

Specifically,

- The residential, industrial and commercial customers, associations of customers, as classified in annex 2 (The DISREP aims to directly benefit Nigerian power sector customers including residential, commercial and industrial customers and in particular women, with broader spillover benefits to other power sector participants and the broader Nigerian economy and environment)
- The core investors in DISCOS, shareholders
- Contractors/ equipment suppliers
- State Government Ministries, Agencies
- DISCOs

There could also be impacts on indirect workers who will be engaged under the program activities. A subset of this category are the vulnerable groups. A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the program. Vulnerable Groups are persons who may be disproportionately impacted or further

disadvantaged by the project as compared with any other groups due to their vulnerable <sup>1</sup>status, and that may require special engagement efforts to ensure their equal representation in the consultation and participation in the program.

The DISREP will contribute to reducing the current reliance on alternative, carbon-intensive energy sources such as diesel/petrol-based generators, kerosene, or firewood, which are expensive and are associated with significant health and environmental impacts including climate impacts. Reliable access to electricity also improves customer productivity and removes a major constraint to economic development.

The provision of reliable electricity access in particular benefits woman and girls, with evidence showing that new energy access and improved energy services can improve development outcomes for women and girls and help bridge the gender gap in many communities, for example, increasing a woman's likelihood of working outside the home and reducing the amount of time women spend on household chores, including sourcing traditional energy supplies.

### **3.2.3 Interested Parties**

Interested Parties include stakeholders who may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could influence the project and the process of its implementation in some way. Specifically, this category will include the following individuals and groups:

- The local population who can benefit indirectly from interventions;
- Residents and business entities, and individual entrepreneurs in the community area of influence;
- Professional groups like Manufactures Association of Nigeria-MAN, Nigerian Bar Association (NBA);
- Local contractors and consultants who can support in the delivery of the Project;
- Local, regional and national level civil societies and non-governmental organizations (NGOs) with an interest in consumer's advocacy, Social Protection and livelihood support;
- Other government ministries and regulatory agencies at regional and national levels including environmental, technical, social development and labour authorities;
- DISREPs Project employees and contractors;
- Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations;
- Local Political groups; and
- Academia

Local NGOs and initiative/advocacy groups, particularly those focusing on consumer's interest and social development issues, represent the considerable capacity that the project(s) may tap for disseminating information and raising awareness of the planned activities among the potentially affected communities in the project area. NGOs typically have well established

---

<sup>1</sup> Vulnerable status may stem from an individual's or group's ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on other individuals or unique natural resources.

interaction with the local communities, are able to propose the most effective and culturally appropriate methods of liaising based on the local customary norms and prevailing means of communication, and possess the facilitation skills that may be utilized as part of the program's consultations. In addition, NGOs may lend assistance in disseminating information about the proposed program(s) to the local communities, including in the remote areas (e.g., by placing information materials about the program in their offices, distributing the project information lists during events that they are organizing), and provide venues for the engagement activities such as focus-group discussions.

## CHAPTER FOUR

### 4.0 STAKEHOLDER ENGAGEMENT PLAN

The goal of the project's Stakeholder Engagement Plan is to promote and provide means for effective, inclusive, accessible and, meaningful engagement with project- affected parties and Implementing Partners throughout the project life -cycle on issues that could potentially affect them during implementation of the various activities listed under the result areas 1, 2, and 3, the IPF and the Technical Assistant component of the program underscoring the DISREP hybrid Operation.

#### 4.1 Engagement Methods and Tools

The program will utilize various methods of engagement through the implementing agencies as part of their continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with Government officials take the form of formal approaches often different from a format of liaising with local communities (e.g., focus group discussions, displays and visuals with a lesser emphasis on technical aspects). Table 4.1 provides the consultation methods for various stakeholder groups.

Nonetheless the format of every engagement activity will meet general requirements on accessibility and ensure the participation of vulnerable individuals and women groups in project consultations with tailored techniques as stated in Table 4. 3. Particular attention will be given to the vulnerable groups to ensure that they are not denied program benefits. This will be done by focus group discussions, monitoring participation rates, undertaking beneficiary assessments, using online platforms to allow access to otherwise disadvantaged groups, and ensuring that at least 30% of participant beneficiaries across the result areas are females.

Information that is communicated in advance of public consultations primarily includes an announcement thereof in the public media – local, regional and national, as well as the distribution of invitations and full details of the forthcoming meeting well in advance, including the agenda. It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the stakeholders. Furthermore, the messages are targeted according to the stakeholder and issues.

There are three important questions to answer when preparing messages as shown in figure 4.1 and the checklist to follow as shown in figure 4.2.





Figure 4.1: Important questions for preparing a message

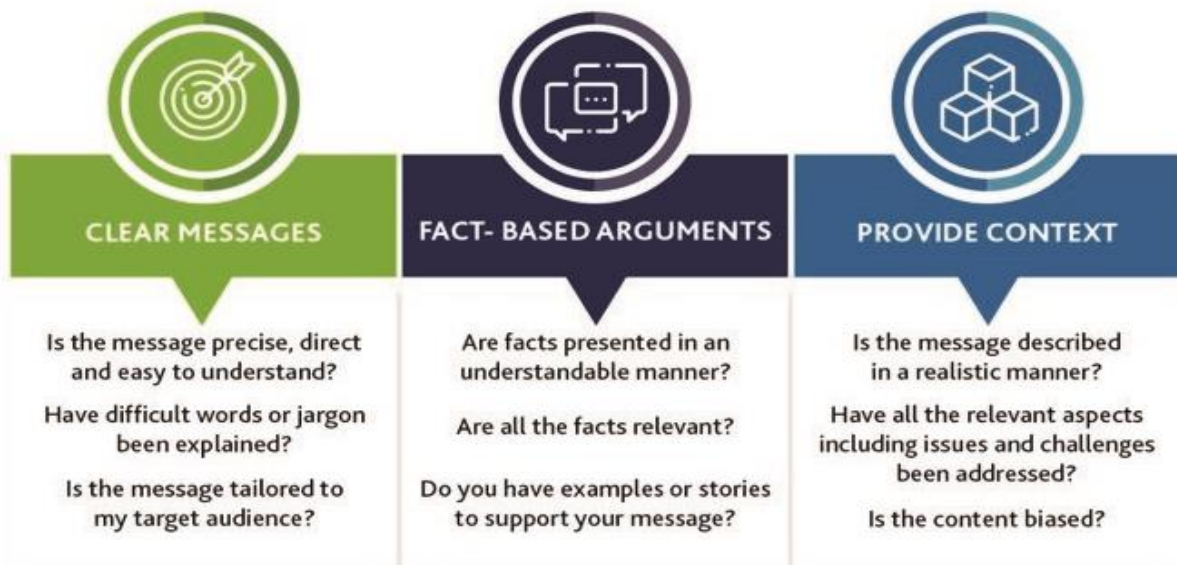


Figure 4.2: Checklist to guide in developing clear messages

The above parameters can be achieved through the following approaches:

Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication. That is, it should be made available via publicly accessible locations and channels. The primary means of notification may include mass media and the dissemination of posters/ advertisements in public places. The project keeps proof of the publication (e.g., a copy of the newspaper announcement) for accountability and reporting purposes. Existing notice boards in the implementing agencies and the community-based



platforms may be particularly useful for distributing the announcements. When the notifications are placed on public boards in open air, it should be remembered that the posters are exposed to weather, may be removed by by-passers or covered by other advertisements. The project's staff will therefore maintain regular checks in order to ensure that the notifications provided on the public boards remain in place and legible.

**Another critical aspect of the meeting preparation process is selecting the methods of communication that reach the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the project.** Oral communication is an option that enables the information to be readily conveyed to such persons. This includes involving the selected stakeholder representatives and institutional leaders to relay up-to-date information on the project and consultation meetings to the various target audiences. Advertising the project and the associated meetings via radio or television and making direct calls (in case fixed-line or mobile phone communication is available) is another method that allows reaching out to the remote audiences. The announcement of a public meeting or a hearing is made sufficiently in advance, thereby enabling participants to make necessary arrangements, and provides all relevant details, including date, time, location/venue and contact persons.

**Placement of the project materials in the public domain** is also accompanied by making available a register of comments and suggestions that can be used by any member of the affected parties, other stakeholders and general public to provide their written feedback on the contents of the presented materials. As a rule, the register is made available for the entire duration of the requisite disclosure period. Where necessary, a project representative or an appointed consultant should be made available to receive and record any verbal feedback in case some stakeholders experience a difficulty with providing comments in the written form.

**Drafting an agenda for the consultation meeting** is an opportunity to provide a clear and itemized outline of the meeting's structure, sequence, chairpersons, a range of issues that will be discussed and a format of the discussion (e.g. presentation/ demonstration followed by a Questions & Answers – Q&A session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the mutual exchange of ideas). A clearly defined scope of issues that will be covered at the meeting gives the prospective participants an opportunity to prepare their questions and comments in advance. It is essential to allocate a sufficient amount of time for a concluding Q&A session at the end of any public meeting or a hearing. This allows the audience to convey their comments and suggestions that can subsequently be incorporated into the design of the project. Keeping a record of all public comments received during the consultations meetings enables the project's responsible staff to initiate necessary actions, thereby enhancing the project's overall approach taking onto consideration the stakeholders' priorities. The recorded comments and how they have been addressed by the project becomes an appropriate material for inclusion in the project's regular reporting to the stakeholders.

As a possible option in addition to the Q&A session nearer the close of the public meeting/hearing, evaluation (feedback) forms may be distributed to participants in order to give them an opportunity to express their opinion and suggestions on the project. This is particularly

helpful for capturing individual feedback from persons who may have refrained from expressing their views or concerns in public. Questions provided in the evaluation form may cover the following aspects:

- Participant's name and affiliation (these items are not mandatory if the participant prefers to keep the form confidential)
- How did they learn about the Program and the consultation meeting?
- Are they generally in favour of the Program?
- What are their main concerns or expectations associated with the Program or the particular activity discussed at the meeting?
- Do they think the Program is of benefit to them and the stakeholder group they represent?
- Is there anything in the Program design and implementation that they would like to change or improve?
- Do they think that the consultation meeting has been useful in understanding the specific activities of the Program, as well as associated benefits and outcomes? What aspects of the meeting do they particularly appreciated or would recommend for improvement?

Bearing in mind that some of the participants might find completion of the evaluation form challenging due to the literacy constraints or concerns about their confidentiality, the distribution of the feedback forms should always be explained that completing the form is optional. Program beneficiaries should also be assured that completion of the evaluation form is entirely voluntary and does not affect their status as beneficiaries. Some persons may be willing to express their feedback verbally and in this case a member of Project staff will be allocated to take notes.

**Distribution of targeted invitations to the consultation meeting or a hearing** is an important element of the preparation process and is based on the list of participants that is compiled and agreed in advance of the consultation. Invitations may be sent both to certain individuals that have been specifically identified as relevant stakeholders (e.g. representatives of government ministries and agencies) and as public invitees (e.g. addressed to initiative and professional bodies, local organizations, and other public entities). Means of distributing the invitations should be appropriate to the customary methods of communication that prevail for the stakeholder. The various means of distribution that can be used includes direct mail (post); other existing public mailings, utility bills, or circulars from a local authority. All invitations that are sent can be tracked in order to determine and manage the response rate. If no response has been received, the invitation can be followed up by a telephone call or e-mail where possible.

Table 4.1: Stakeholder group consultation methods

STAKEHOLDER GROUP	CONSULTATION METHODS
Government officials	<ul style="list-style-type: none"> <li>• Phone / email / text messaging</li> <li>• One-on-one interviews</li> <li>• Formal meetings</li> </ul>
Local communities	<ul style="list-style-type: none"> <li>• Print media, text messaging and radio announcements</li> <li>• Public meetings</li> <li>• Focus group meetings</li> <li>• Surveys</li> <li>• Information Centre</li> </ul>

Vulnerable Groups	<ul style="list-style-type: none"> <li>• Print media, text messaging and radio announcements</li> <li>• Public meetings</li> <li>• Focus group meetings</li> <li>• Surveys</li> <li>• Information Centre</li> </ul>
Employees and managers	<ul style="list-style-type: none"> <li>• Phone / email / text messaging</li> <li>• Print media and radio announcements</li> <li>• Workshops</li> <li>• Focus group meetings</li> <li>• Surveys</li> </ul>
NGOs, CSOs Political Groups, Academia, Partnering organizations and other interest groups	<ul style="list-style-type: none"> <li>• Phone / fax / email / text messaging</li> <li>• One-on-one interviews</li> <li>• Focus group meetings</li> <li>• Information Centre</li> <li>• Press Statement</li> </ul>

NB: All consultation must take into consideration the Nigeria Center for Disease Control and World Bank COVID 19 guidelines for public meeting and consultation.

## 4.2 Identifying Themes to Discuss with Stakeholders

An important part of the Stakeholder Engagement process is to identify themes to discuss with Stakeholders and to ensure that these themes include issues that are important to customers.

Stakeholders should also be given the opportunity to highlight any other issues of importance which have not been identified by DISCO.

The following list shows the themes identified to discuss with Stakeholders.

1. Keeping the lights on, Smart networks, Security of Supply
  - a. Network reliability / Security of Supply
    - i Frequency of power outages
    - ii Duration of power outages
    - iii Flexible Connections
2. Willingness to pay - test what customers most value
  - a. The level of reliability customers expects
  - b. Customers to identify specifically which, if any, initiatives or service improvements are valued sufficiently that they would be prepared to fund them
  - c. Customers to identify where a reduction in service could be tolerated in exchange for a lower cost to them
3. Flexibility of Supply
  - a. Demand
    - i Access, e.g., timed or variable access connections
    - ii Demand response provision
  - b. Generation
    - i Access, e.g., timed or variable access connections, Active Network Management Systems
    - ii Curtailment – how could it work?
    - iii Data required to assess project viability
4. Workforce renewal, skills & training.

5. Government legislation & Policy.
6. Vulnerability & affordability
7. Customer information & data
8. Customer awareness
9. Environment & sustainability
10. Other projects or trials that Stakeholders are aware of or any successful trials that have been transferred into 'Business-As-Usual' in the industry
11. Any other issues with existing DISCO Planning Standards that Stakeholders wish to highlight particularly with respect to the PIP.
12. Compliance issues on environment, health, safety, labour and targets

### 4.3 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. In order to fulfil this requirement, a range of consultation methods are applied. Table 4.2 describes the appropriateness of each engagement technique.

A summary description of the engagement methods and techniques that will be applied by the Nigeria DISREP Program is provided in table 4.3 below. **The summary presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation.**

An attendance list should be made available at the commencement of all engagement activities in order to record all participants who are present at the meeting. Wherever possible, attendees' signatures should be obtained as a proof of their participation. Details of the attendees who were not initially on the list (e.g. those participating in place of somebody else, or general public) should be included in addition to those who have registered for the meeting in advance.

In most cases and as a general practice, the introductory initial part of the meeting should be delivered in a format that is readily understandable to the audience of laypersons and should be free of excessive technical jargon. If necessary, preference should be given, whenever possible, to the oral and visual methods of communication (including presentations, pictorials, illustrations, graphics and animation) accompanied by hand-out materials imparting the relevant information in understandable terms rather than as text laden with technical intricacies.

If a large audience is expected to attend a public meeting or a hearing, necessary arrangements will be made to ensure audibility and visibility of the presentations. This includes provision of a microphone, proper illumination, projector, places allocated for the wheelchair users, etc. The specific considerations for vulnerable persons are summarised in table 4.4.

Taking records of the meeting is essential both for the purposes of transparency and the accuracy of capturing public comments. At least three ways of recording may be used, including:

- Taking written minutes of the meeting by a specially assigned person or a secretary;
- audio recording (e.g. by means of voice recorders); and

- Photographing.

The latter should be implemented with a reasonable frequency throughout the meeting, allowing notable scenes to be captured but at the same time not distracting or disturbing the audience excessively. Where feasible, a video recording may also be undertaken. Combination of these methods ensures that the course of the meeting is fully documented and that there are no significant gaps in the records which may result in some of the important comments received from the stakeholder audience being overlooked.

Table 4.2: Engagement Techniques

TECHNIQUE	MOST APPROPRIATE APPLICATION OF TECHNIQUE
Information Centre and Information Boards	<ul style="list-style-type: none"> <li>• Establish Information Boards in each Project area community.</li> </ul>
Correspondence by phone/email/ Text/Instant messaging	<ul style="list-style-type: none"> <li>• Distribute project information to government officials, organisations, agencies and companies</li> <li>• Invite stakeholders to meetings</li> </ul>
Print media and radio announcements	<ul style="list-style-type: none"> <li>• Disseminate project information to large audiences, and illiterate stakeholders</li> <li>• Inform stakeholders about consultation meetings</li> </ul>
One-on-one interviews	<ul style="list-style-type: none"> <li>• Solicit views and opinions</li> <li>• Enable stakeholders to speak freely and confidentially about controversial and sensitive issues</li> <li>• Build personal relations with stakeholders</li> <li>• Recording of interviews</li> </ul>
Formal meetings	<ul style="list-style-type: none"> <li>• Present project information to a group of stakeholders</li> <li>• Allow the group of stakeholders to provide their views and opinions</li> <li>• Build impersonal relations with high level stakeholders</li> <li>• Distribute technical documents</li> <li>• Facilitate meetings using PowerPoint presentations</li> <li>• Record discussions, comments/questions raised and responses</li> </ul>
Public meetings	<ul style="list-style-type: none"> <li>• Present project information to a large audience of stakeholders, and in particular communities</li> <li>• Allow the group of stakeholders to provide their views and opinions</li> <li>• Build relationships with local communities</li> <li>• Distribute non-technical project information</li> <li>• Facilitate meetings using PowerPoint presentations, posters, models, videos and pamphlets or project information documents</li> <li>• Record discussions, comments/questions raised and responses</li> </ul>
Workshops	<ul style="list-style-type: none"> <li>• Present project information to a group of stakeholders</li> <li>• Allow the group of stakeholders to provide their views and opinions</li> <li>• Use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies</li> <li>• Recording of responses</li> </ul>
Focus group meetings	<ul style="list-style-type: none"> <li>• Allow a smaller group of between 8 and 15 people to provide their views and opinions of targeted baseline information</li> <li>• Build relationships with local communities</li> <li>• Use a focus group interview guideline to facilitate discussions</li> </ul>

	<ul style="list-style-type: none"> <li>• Record responses</li> </ul>
Surveys	<ul style="list-style-type: none"> <li>• Gather opinions and views from individual stakeholders</li> <li>• Gather baseline data</li> <li>• Record data</li> <li>• Develop a baseline database for monitoring impacts</li> </ul>

Table 4.3: Methods/Tools for Information Provision, Feedback, Consultation and Participation

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
<b>Information Provision</b>					
Distribution of printed public materials: leaflets, brochures, fact sheets	Used to convey information on the Program and regular updates on its progress to local, regional and national stakeholders.	Printed materials present illustrative and written information on the DISREP program including the PIP among others. Presented contents are concise, clear and easy to understand by a layperson reader. Graphics and pictorials are widely used to describe technical aspects and aid understanding.	Distribution as part of consultation meetings, awareness campaigns, discussions and meetings with stakeholders. Conduct a workshop to develop standard messages for campaigns and interventions to be used for priority target audiences Conduct mass media campaigns both at national media and local stations Conduct social media campaign on (Facebook, Twitter, YouTube, WhatsApp, etc). Preparing briefs for policymakers, web pages for the general public, guides for technical staff, reports or videos to local stakeholders (e.g. village committees) and project participants.	Government Ministries, Departments and Agencies at state and Federal levels All project affected parties Project interested parties Other potential stakeholders	At regular intervals during Project preparation, Implementation and closure
Distribution of printed public materials: newsletters/ updates	A newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of Program achievements, announcements of planned activities, changes, and overall progress.	Circulation of the newsletter or update sheet with a specified frequency in the Project Area of Influence, as well as to any other stakeholders that expressed their interest in receiving these periodicals. Means of distribution – post, emailing, electronic subscription, delivery in person. The mailed material can be accompanied by an enclosed postage-paid comment/feedback form that a reader can fill in a return to the Project's specified address.	All projected affected parties All project interested parties Implementing Agencies and Partners Government Ministries, Departments and Agencies	Quarterly through the life cycle of the program
Printed advertisements in the media	Inserts, announcements, press releases, short articles or feature	Notification of forthcoming public events or commencement of specific Project activities.	Placement of paid information in local, regional and national printed media,	All projected affected parties All project interested parties Other potential stakeholders	On commencement

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	stories in the printed media – newspapers and magazines	General description of the Program and its benefits to the stakeholders.	including those intended for general reader and specialised audience Arrange for outdoor advertising		of specific activities
Radio or television entries	Short radio programmes, video materials or documentary broadcast on TV. Presentations at village level	Description of the Program, Program development update and processes. Advance announcement of the forthcoming public events or commencement of specific Program activities.	Collaboration with media producers that operate in the region and can reach local audiences. Documentary campaign at national and state stations on impact and success story in local communities Production of musical sting for to be used in sponsored radio programmes	Government Ministries, Departments and Agencies Implementing agencies and partners All projected affected parties All project interested parties Other potential stakeholders	10 minutes weekly updates
Visual presentations	Visually convey Project information to affected communities and other interested audiences.	Description of the Project activities, processes and timeline. Updates on Project development.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders. Video simulation animations	Participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. Government Ministries, Departments and Agencies	On a need basis
Notice/disclosure boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific Project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, village cultural centres, post offices, shop, local administrations.	All projected affected parties All project interested parties Other potential stakeholders	Regularly
<b>Information Feedback</b>					
Information repositories accompanied by a feedback mechanism	Placement of Project-related information and printed materials in dedicated/designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various Project-related materials and documentations.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience are also given free access to a register of comments and suggestions.	All projected affected parties	Weekly update
Dedicated telephone line (hotline)(toll free)	Setting up a designated and manned telephone line that can be used by the public to obtain	Any issues that are of interest or concern to the direct project	Telephone numbers are specified on the printed materials distributed to	Any project stakeholder and interested parties.	Available all through the project cycle



Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	information, make enquiries, or provide feedback on the Project. Initially, telephone numbers of Project's specialised staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations, social and environmental protection.	beneficiaries and other stakeholders.	Project stakeholders and are mentioned during public meetings. Project's designated staff should be assigned to answer and respond to the calls, and to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.		
Internet/Digital Media	Launch of Project website to promote various information and updates on the overall Project, impact assessment and impact management process, procurement, employment opportunities, as well as on Project's engagement activities with the public. Web-site should have a built-in feature that allows viewers to leave comments or ask questions about the Project. Website should be available in English	Information about Project operator and shareholders, Project development updates, employment and procurement, environmental and social aspects.	A link to the Project web-site should be specified on the printed materials distributed to stakeholders. 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.	Project stakeholders and other interested parties that have access to the internet resources.	Available all through the project cycle
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 hearings.	Description of the proposed Project and related processes. Questions targeting stakeholder perception of the Project, 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 project affected parties.	
Feedback & Suggestion Box	A suggestion box can be used to encourage residents in the affected communities to leave written feedback and comments about the Project. Contents of the suggestion box should be checked by designated	Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the stakeholders. Information about the availability of the suggestion box should be communicated as part of Project's	Project affected parties, especially vulnerable groups.	

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
	Project staff on a regular basis to ensure timely collection of input and response/action, as necessary.		regular interaction with local stakeholders.		
<b>Consultation &amp; Participation</b>					
Public hearings State and National Assembly	Project representatives, the affected public, authorities, regulatory bodies and other stakeholders for detailed discussion on a specific activity or facility that is planned by the Project and which is subject to the statutory expert review.	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	Wide and prior announcement of the public hearing and the relevant details, including notifications in local, regional and national mass media. Targeted invitations are sent out to stakeholders. Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing. Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period.	Project affected parties Relevant government Ministries Departments and Agencies. NGOs and civil societies Other interested parties	On a need basis
Focus Group Discussions and Round Table Workshops	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, processes that require detailed discussion with affected stakeholders.	Announcements of the Forthcoming meetings are widely circulated to participants in advance (at least two weeks). Targeted invitations are sent out to stakeholders.	All project affected parties especially vulnerable groups; Project delivery agencies DISREP employees and contractors NGOs and civil societies Implementing Agencies and Partners Relevant Government Ministries and Agencies	On a need basis
Household visits	Household-level visits can be conducted to supplement the statutory process of public hearings, particularly to solicit feedback from affected people and vulnerable persons who may be unable to attend the formal hearings	- Description of the Project and related solutions/impact management measures - Any questions, queries or concerns, especially for stakeholders that may have a difficulty expressing their views	- Visits should be conducted by designated staff with specified periodicity	Directly affected people	On a need basis

Method / Tool	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
		and issues during formal community-wide meetings.			
Information centers and field offices	Project's designated venue for depositing Project related information that also offers open hours to the community and other members of the public, with Project staff available to respond to queries or provide clarifications.	-Project-related materials, including updates of project status - Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the information center/field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits	Directly affected communities and any other stakeholders and interested parties	
Site Tours	Visits to project sites and facilities organized for local communities, authorities, and the media to demonstrate Project solutions. - Visitors are accompanied by the Project's staff and specialists to cover various aspects and to address questions arising from the public during the tour - Could be in conjunction with meeting	Demonstration of specific examples of Project's design solutions and approaches to managing impacts.	Targeted invitations distributed to selected audience offering an opportunity to participate in a visit to the Project Site. Limitation: possible safety restrictions on the site access during active construction works	Local communities - Elected officials - Media groups - NGOs and other initiative groups	

Table 4.4: Consultation methods for vulnerable groups

Category	Method of consultation
Elderly	Recognize their organization and leadership, focus group meetings, assisted transport to meetings
Women	Additional separate focus group meetings, recognize cultural norms
Youth	Additional focus group meetings
Minority groups	Focus group meetings in a language of their understanding
People with Disabilities	Recognize their organization and leadership, focus group meetings, Assisted transport to meetings

#### 4.4 Institutional Stakeholders Engagement

**Policy coordination at the national level is the highest level of engagement.** This level comprises not only the Office of the Vice Presidential and line ministries responsible for the power sector efficiency, but it also includes donors, CSOs, and development partners.

Coordination is broken down into two elements: setting up **agreements on the shared goals** that are to be achieved, and increasing the **integration of activities** of different programmes to achieve those common goals. These different aspects of coordination take place at different levels of governance: whilst goal coordination will occur at the national level by greater coherence between policies and programme design, coordination of means and activities will take place at the institutional levels through greater integration of operational/administrative activities. Finally, coordination will be required within each level of governance (horizontal coordination), as well as between the levels (vertical coordination).

The framework for stakeholder engagement of the implementing agencies under the technical component is indicative in figure 4.4. below. Table 4.5 presents a variety of approaches to facilitate the processes of information provision, information feedback as well as participation and consultation within the implementing institutions and partners.

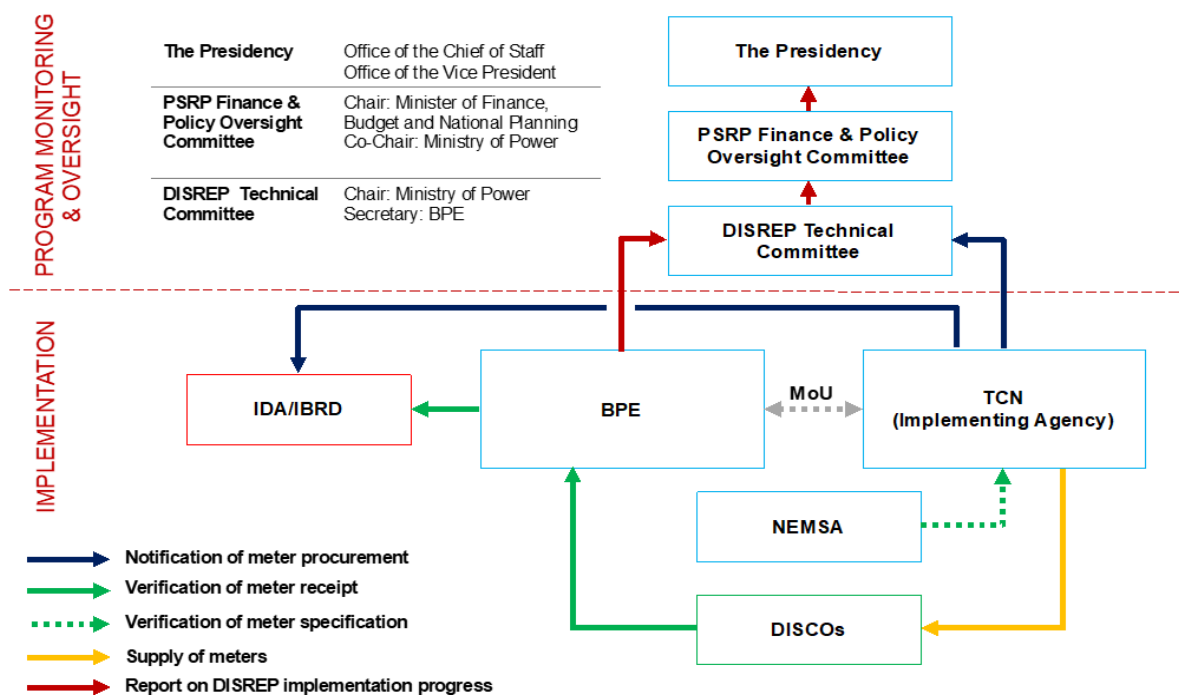


Figure 4.3: Configured Coordination structures in line with the Nigeria DISREP

Table 4.5: Stakeholder Engagement Among the Implementing Agencies, Partners and DISREP Coordinating Agency under the IPF AND TA components

Actors	Description and Use	Contents	Dissemination Method	Target Groups	Frequency
<b>Project Implementation Units (PIUs), Technical Committee and Oversight Committees (see frame work under figure 4.3)</b>  <b>Independent Verification Agency (IVA)</b>	<ul style="list-style-type: none"> <li>• setting up agreements on the shared goals that are to be achieved, and increasing the integration of activities to deliver the shared goals.</li> <li>• Have set objectives, milestones or reporting mechanisms directly related to coherence and integration objectives of the DISREP vision and in particular the PIP.</li> <li>• Facilitates data reporting on DLIs</li> <li>• Vertical coordination relying on both top-down mechanisms (in terms of delegating responsibilities, allocating budgets, monitoring) and bottom-up mechanisms (on feedback and reporting, as well as the communication of information collected at the district/sub-district level)</li> <li>• Coordination efforts of implementation activities (including the management of information, or delivery of benefits) can be integrated between programmes.</li> </ul>	<ul style="list-style-type: none"> <li>• Project-related materials.</li> <li>• Any issues that are of interest or concern to the local communities and other stakeholders.</li> <li>• Good programme-level information</li> <li>• The information collected at the local level (about the</li> <li>• Number of beneficiaries or implementation effectiveness for instance) that needs to feed into policy and planning at the other levels.</li> </ul>	<ul style="list-style-type: none"> <li>• Information about the info centre or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.</li> <li>• Information sharing and reporting across the DISREP is promoted through the committee meetings, and through the M&amp;E database</li> <li>• The use of administrative tools which can be shared between programmes</li> </ul>	<ul style="list-style-type: none"> <li>• All project affected parties</li> <li>• Project interests' parties</li> <li>• potential stakeholders</li> </ul>	Through the entire program cycle
Non state actors, Traditional / Community Leaders	<ul style="list-style-type: none"> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Project related information, SEA/SH, Nondiscriminatory prohibition messages program impact, benefits and available feedback channels</li> </ul>	<ul style="list-style-type: none"> <li>• Community outreach / town criers, dedicated Toll free telephone lines, fliers and town hall meeting adhering to NCDC and state applicable Covid 19 protocol.</li> </ul>	<ul style="list-style-type: none"> <li>• All project affected parties</li> <li>• Project interests' parties</li> <li>• Other potential stakeholders</li> </ul>	Defined regular times to coincide with local customs.
National / State Legislators / Cabinet Committees	<ul style="list-style-type: none"> <li>• getting issues on to the policy agenda, Public opinion, generating endorsement and awareness of programmes</li> <li>• Change (or no change) in policy content</li> </ul>	<ul style="list-style-type: none"> <li>• Preparing briefs for policymakers, on updates and performance scorecard</li> </ul>	<ul style="list-style-type: none"> <li>• Face to face meetings</li> <li>• Meetings with elected officials in communities surrounding programme.</li> <li>• Meetings with officials</li> <li>• Press conferences</li> <li>• Interviews (media traditional and digital)</li> <li>• Social Media Strategy</li> <li>• Digital PR</li> </ul>	<ul style="list-style-type: none"> <li>• Project interests' parties</li> <li>• Other potential stakeholders</li> </ul>	On a need basis

## 4.5 Consultation with Stakeholders

When consultation actually takes place, it should be after an extensive period of preparation, as outlined in the previous stages, and should exhibit the following characteristics. Any consultation should be:

**Representative:** it is important that those involved in the consultation process are as representative as practicable of the full range of stakeholders affected by the DISREP Program actions, to ensure that the Program can build as meaningful relations as possible (see Section 4.5). While it may be easier to engage with the most sympathetic, organised, vocal or powerful stakeholders, consulting with minority organisations or those who are less vocal or powerful, can help to produce more representative, accurate and appropriate conclusions regarding stakeholders' issues and mechanisms to address those issues, thus allowing the Program to more effectively and successfully respond to stakeholders.

Winning the support of one or two 'big' stakeholders does not necessarily indicate that meaningful engagement has been achieved; not all community or environmental groups (for example) have the same view of or priority for an issue.

**Responsive:** by providing information, analysis and proposals that respond directly to stakeholder expectations and interests already identified through the preparation phases – i.e. be stakeholder driven and focused, rather than responding to internal objectives and activities of the business, or being shaped by your organisation's organisational behaviour

**Context focused:** by making available information and analysis that is contextualised so that stakeholders are able to gain a detailed, holistic and complete picture of the DISREP Program and organisational motivations, culture and behaviour, and assess the relevance of each of these to the ultimately observed organisation's action with respect to the DISREP Program.

**Complete:** by providing appropriate background information together with the historical or analytical basis to certain decisions, thus allowing stakeholders to draw a 'fair and reasonable' conclusion as to why the organisation responded in a particular way to an issue. An efficient internal knowledge management system will help collate and provide this information.

**Realistic:** in the 'negotiation' process with stakeholders there may be an inevitable trade off of expectations, needs and objectives, where both parties recognise that they may not ultimately achieve everything they had originally set out to accomplish. Nevertheless, this trade off in itself can be extremely positive to the overall engagement process, allowing trust to be strengthened as each side demonstrates that they can be moderate and realistic, ahead of a significant commitment in time and resources being made. As part of this process, ensure there is accurate representation of the intentions of the DISREP Program and implementing organisation, providing clarity on expectations of the 'negotiation' i.e. what is on the table for discussion and what is not.

## 4.6 Disclosure and Participation Plan

Information disclosure is an important activity not just as a form of engagement but for also enabling the other engagement activities to be undertaken in an informed and participatory

manner. This section outlines the process to be followed for the disclosure and participation as part of the DISREP Project implementation.

It is required under ESS 10 that the Proponent will maintain and disclose as part of the environmental and social 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.

#### **4.6.1 Disclosure Mechanism**

The process of information disclosure can be undertaken in two ways: either voluntary disclosure or disclosure as part of the regulatory requirements (EIA requirements, public hearing). While regulatory disclosure involves the provisioning of information as required by the authorities and agencies involved in the project, voluntary disclosure refers to the process of disclosing information to the various stakeholders in a voluntary manner.

This disclosure not only allows for trust to be built amongst the stakeholders through the sharing of information, but it also allows for more constructive participation in the other processes of consultation and resolution of grievances due to availability of accurate and timely information.

#### **4.6.2 Process for Disclosure of Information**

As a standard practice, this SEP in English will be released for public review for the period of 21 days in accordance with Nigerian Regulatory Frameworks. Distribution of the disclosure materials will be done by making them available at venues and locations convenient for the stakeholders and places to which the public have unhindered access. Free printed copies of the SEP in English will be made accessible for the general public at the following locations:

- Office of the Chief of Staff
- Office of the Vice President
- Federal Ministry of Finance Budget and National Planning (FMoF);
- Federal Ministry of Power (MOP)
- Bureau of Public Enterprises (BPE)
- Nigerian Electricity Regulatory Commission (NERC)
- Eleven Distribution Companies (DISCOs)
- Transmission Company of Nigeria (TCN).
- Nigerian Electricity Management Services Agency (NEMSA).
- The EA Department of the Federal Ministry of Environment; and
- Other designated public locations to ensure wide dissemination of the materials.

Electronic copies of the SEP will be placed on the website of the Bank and each implementing agencies. 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 online 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 the aforementioned disclosed materials to local, regional and national NGOs, relevant professional bodies as well as other



interested parties. Translation of the executive summaries in relevant local language and its posting in the designated community centres.

#### 4.7 Timetable for Disclosure

The disclosure process associated with the release of project E&S appraisal documentation, as well as the accompanying SEP will be implemented within the following timeframe:

- Placement of the SEP in public domain – Dates to be confirmed by DISREP Implementing Agencies
- 21-day disclosure period – Dates to be confirmed by DISREP Implementing Agencies
- Public consultation meetings with project stakeholders to discuss feedbacks and perceptions about the program – Dates to be confirmed by DISREP Implementing Agencies
- Addressing stakeholder feedback received on the entire disclosure package – Dates to be confirmed by DISREP Implementing Agencies.

The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment.

The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table 4.6 below provides a description of stakeholder engagement and disclosure methods recommended to be implemented during stakeholder engagement process.

Table 4.6: Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
<ul style="list-style-type: none"> <li>• Project Affected Parties</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder Engagement Plan;</li> <li>• Public Grievance Procedure;</li> <li>• Regular updates on Project development.</li> </ul>	<ul style="list-style-type: none"> <li>• Public/Disclosure notices at Community level.</li> <li>• Electronic publications and press releases on the Project web-site.</li> <li>• Dissemination of hard copies at designated public locations.</li> <li>• Press releases in the local media.</li> <li>• Consultation meetings.</li> <li>• Information leaflets and brochures.</li> <li>• Separate focus group meetings with vulnerable groups, as appropriate.</li> </ul>
<ul style="list-style-type: none"> <li>• Non-governmental Organizations</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder Engagement Plan;</li> <li>• Public Grievance Procedure;</li> <li>• Regular updates on Project development.</li> </ul>	<ul style="list-style-type: none"> <li>• Public notices.</li> <li>• Electronic publications and press releases on the project web-site.</li> <li>• Dissemination of hard copies at designated public locations.</li> <li>• Press releases in the local media.</li> <li>• Consultation meetings.</li> <li>• Information leaflets and brochures.</li> </ul>

Stakeholder Group	Project Information Shared	Means of communication/ disclosure
<ul style="list-style-type: none"> <li>Ministries, Departments and Agencies</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder Engagement Plan;</li> <li>PIP update</li> <li>Regular updates on Project development;</li> <li>Additional types of Project's information if required for the purposes of regulation and permitting.</li> </ul>	<ul style="list-style-type: none"> <li>Dissemination of hard copies of the ESSA package, and SEP at municipal administrations.</li> <li>Project status reports.</li> <li>Meetings and round tables.</li> </ul>
<ul style="list-style-type: none"> <li>Implementing Agencies</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder Engagement Plan;</li> <li>PIP updates</li> <li>Regular updates on Project development;</li> <li>Additional types of Project's information if required for the purposes of implementation and timeline.</li> </ul>	<ul style="list-style-type: none"> <li>Public Notices</li> <li>Consultation Meetings</li> <li>Information leaflets and brochures.</li> </ul>
<ul style="list-style-type: none"> <li>Related businesses and enterprises</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder Engagement Plan;</li> <li>Public Grievance Procedure;</li> <li>Updates on Project development and tender/procurement announcements.</li> </ul>	<ul style="list-style-type: none"> <li>Electronic publications and press releases on the Project web-site.</li> <li>Information leaflets and brochures.</li> <li>Procurement notifications.</li> </ul>
<ul style="list-style-type: none"> <li>Project Employees</li> </ul>	<ul style="list-style-type: none"> <li>Employee Grievance Procedure;</li> <li>Updates on Project development.</li> </ul>	<ul style="list-style-type: none"> <li>Staff handbook.</li> <li>Email updates covering the Project staff and personnel.</li> <li>Regular meetings with the staff.</li> <li>Posts on information boards in the offices and on site.</li> <li>Reports, leaflets.</li> </ul>

## CHAPTER FIVE

### 5.0 RESOURCES AND RESPONSIBILITIES

#### 5.1 Introduction

In this sub-section the proposed organizational structure and management functions for the stakeholder engagement function at DISREP are described. The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within participating PMU domiciled in BPE and local sub-contractors.

The roles and responsibilities of the organizations are presented below in table 5.1. The Project Implementation Unit (PMU) will be responsible for the preparation and physical implementation of the DISREP Programme.

Table 5.1: Organizational Roles and Responsibilities

Role	Responsibility / Accountability
<b>National Program Coordinator at the PMU and dedicated team comprising of:</b> Research and Development, Project Manager, Procurement Officer, Transmission and Substations Engineer, Social Development Officer and an Environmental Officer	<ul style="list-style-type: none"> <li>Formalise and fulfil roles and responsibilities for the effective functioning of coordination at all levels and establishing institutional partnerships for coordination:</li> <li>Ensure proper implementation and follow up of the SEP.</li> <li>Development of an implementation plan across the DISREP, with explicit objectives, activities and monitor able deliverables that can guide the work of both technical and oversight committees</li> <li>Provide capacity development for effective coordination:</li> <li>Allocation of funding towards committee meetings at all levels</li> <li>Ensure that contractor's and DISREP employees are informed and trained on the SEP.</li> <li>Ensure the DISREP environmental and Occupational Health and Safety Specialist and a Social Specialist team reports on time and with the expected and agreed points.</li> <li>Provide resources to ensure that interests of stakeholders are represented and taken into consideration during implementation of Programmes.</li> </ul>
National Program Coordinator & Procurement specialist.  Social Specialist	<ul style="list-style-type: none"> <li>Ensure that employees and subcontractors have in their contracts a stakeholder engagement/community relations management clause and they are aware and trained on the SEP.</li> <li>Coordinate required SEP support and trainings for staff in coordination with environmental and Occupational Health and Safety Specialist and a Social Specialist team and Human Resources Manager.</li> </ul>
<ul style="list-style-type: none"> <li>Environmental and Occupational Health and Safety Specialist,</li> <li>Social Specialist Team</li> </ul>	<p><b><u>Social Development Specialist:</u></b></p> <p>As the primary interface between the Project and stakeholders, including the local community, the Social Specialist will:</p> <p>Develop, implement and monitor all stakeholder engagement strategies/plans for the Project;</p> <p>Interact with related and complementary support activities that require <i>ad hoc</i> or intensive stakeholder engagement</p> <ul style="list-style-type: none"> <li>Proactively identify stakeholders, project risks and opportunities and inform the PM / senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities</li> <li>Lead the SEP from the sponsor perspective and coordinate the results and actions to be taken with the H&amp;S and Environmental Manager and later with the DISREP Team</li> <li>Review the SEP viability with the H&amp;S and Environmental Specialist</li> <li>Manage the grievance mechanism;</li> </ul>

	<ul style="list-style-type: none"> <li>• Lead day-to-day implementation of the SEP and Community Grievance Mechanism, including proactively maintaining regular contact with affected communities through regular community visits to monitor opinions and provide updates on Project activities, and ensuring communication with vulnerable groups.</li> <li>• Produce stakeholder engagement monitoring reports and submit to National Programme Coordinator.</li> <li>• Supervise/monitor and coordinate activities to ensure that staff and all sub-contractors comply with the SEP.</li> <li>• Manage the day-to-day working, utilisation, implementation of SEP by all parties engaged on the Program.</li> </ul> <p><b><u>Environmental Occupational Health and Safety Specialist:</u></b></p> <ul style="list-style-type: none"> <li>• Review the SEP ensuring compliance in terms of environmental, H&amp;S requirements and provide feedback to Social specialist.</li> </ul>
<b>subcontracted employees</b>	<ul style="list-style-type: none"> <li>• Comply with requirements stated under this document - Non-compliance will be treated as a disciplinary matter.</li> <li>• Provide assistance if needed to ensure compliance with this plan.</li> <li>• Perform assigned tasks towards meeting SEP objectives.</li> <li>• Communicate concerns, questions or views to their supervisor or the compliance or implementation of the SEP.</li> <li>• Provide data related to SEP performance/monitoring as required.</li> </ul>
The DISREP Ombudsman	The ombudsman shall be responsible for resolving all grievances escalated to it. The ombudsman shall meet quarterly to review the grievance registers maintained by each implementing agency and use the same to update the grievance dashboard which shall be the compendium of all grievances raised across implementing agencies.

In order to advance the DISREP Program coordinate overall procurement, perform audits, provide financial report, conduct stakeholders engagement, project disclosure and outreach and ensure availability of resources, the PIU will work collaboratively with some of the Federal and State Ministry of Finance Budget and National Planning (FMOF) and Ministry of Power (MOP) -Implementing departments and stakeholders such as (i) Purchasing, (ii) Finance, (iii) Customer Services, (iv) Technical Services Department, (v) Tender Committee, (vi) and Public Affairs Department on a needed basis.

### **5.1.1 External Resources**

In case the internal capacity resources at the project appear to be insufficient, the project will also consider engaging a reputed third party in the form of the organization familiar with the region and are acceptable to the community. The NGO would then not only serve as a link between the DISREP project and the community but as a third party in the implementation of the SEP and GRM.

### **5.1.2 Training**

The project will, from time to time assess the adequacy and capacity of the PIU team members in terms of their understanding of the SEP and GRM put in place for the project and the principles governing the same. Provisions for refresher trainings will be put in place.

All parties involved on the SEP will attend a workshop that will orient everyone about the Project and appraise all individuals of responsibilities and reporting structures.

### **5.1.3 Financial Resources**

The project will ensure that the budget formulated for the purpose of the stakeholder engagement process and grievance redress is sufficient to meet the expenses of the same. In case of grievances requiring monetary compensation, the amount for the same will be provided through the dedicated escrow account set up for the project.

### **5.1.4 Budget**

The Project Implementation Unit has an adequate standing budget allocated towards the Stakeholder Engagement Program. This is a budget that, as at when necessary, will be supplemented and/or increased by other budgets related to the activities required for the SEP. Once the project has been finalised, a detailed budget for the implementation of this SEP will be provided and this will be included in the updated SEP. Annex 1 has a proposed budget line for SEP for participating entities.

## CHAPTER SIX

### 6.0 GRIEVANCE MANAGEMENT

In compliance with applicable local and national laws and the World Bank's ESS10, a project-specific mechanism is being set up to handle complaints and issues. This process would be specially designed to collect, collate, review and redress stakeholders' concerns, complaints and grievances. This process will be carried out using dedicated communication materials (specifically, a GRM brochure or pamphlet) which will be developed to help stakeholders become familiar with the grievance redress channels and procedures as indicated in figure 6.1.

This procedure is considered an important pillar of the stakeholder engagement process since it creates opportunities for DISCO, other stakeholders and communities to identify problems and discover solutions together (IFC, 2009). A grievance can be defined as "a real or imagined cause for complaint." It may be expressed formally or informally. They are usually related to alleged or potential risks and adverse impacts associated with an operations, an alleged noncompliance with a project commitment, or to matters concerned with employment and working conditions.

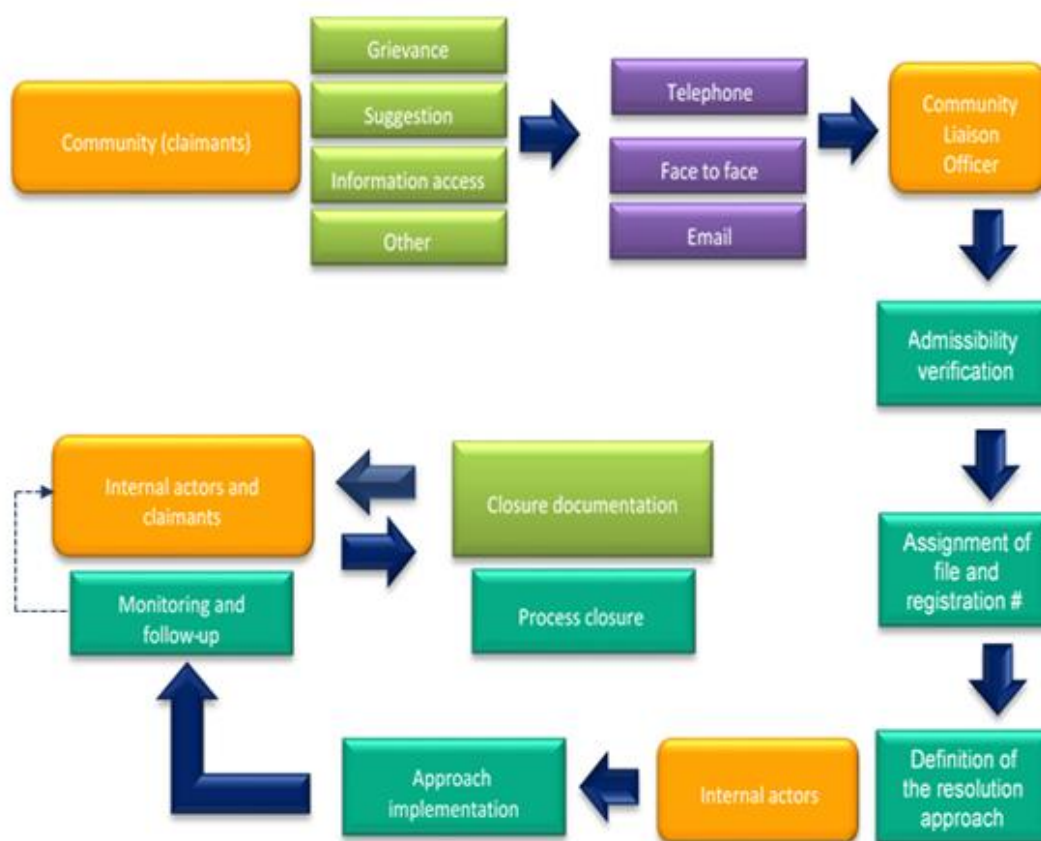


Figure 6.1: Grievance Mechanism flowchart

### 6.1 Grievance Redress Mechanism (GRM)

Project-affected-people and any other stakeholders may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). The overall objectives of the GRM are to:

- Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to specifics in program components.
- Strengthen accountability to beneficiaries, including project affected people.

The GRM will be accessible to all external project stakeholders, including affected people, community members, civil society, media, and other interested parties. Stakeholders can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the program as it affects them. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. The initial effort to resolve grievances to the complainant's satisfaction will be undertaken by the participating section / unit of each DISCO. If the unit is not successful in resolving the grievance, the grievance would be escalated to the DISREP PMU's grievance unit of the TCN and BPE as appropriate and if unsuccessful at this stage, the grievance will be escalated to the Oversight Monitoring implementing agencies at the Federal level. All grievance that cannot be resolved at that level shall be allowed to go the court of law.

## 6.2 Grievance Resolution Framework

Information about the GRM will be publicized as part of the initial program consultations and disclosure in all the participating agencies. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project implementation unit offices, notice boards available to strategic stakeholders, etc. Information about the GRM will also be posted online at the implementing agencies' websites.

The overall grievance resolution framework will include six steps described below. The six steps demonstrate a typical grievances resolution process.

- **Step 1: Uptake.** Project stakeholders will be able to provide feedback and report complaints through several channels such as filling up grievance forms, reporting grievances to implementing agencies, submitting grievance via email address made available by the implementing units and via the implementing institutions' websites collection boxes stipulated for the grievance uptake.
- **Step 2: Sorting and processing.** Each unit / department of the implementing institutions will conduct a prompt sorting and processing of all grievances. The processing will involve the internal escalation process to specific desks to review, resolve and respond to grievances raised.
- **Step 3: Acknowledgement and follow-up.** Within seven (7) days of the date a complaint is submitted, the responsible person within the unit will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. The information provided to complainant would also include, if required, the likely procedure if complaints had to be escalated outside the unit and the estimated timeline for each stage.
- **Step 4: Verification, investigation and action.** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complainant's validity, and then developing a proposed resolution. It is expected that many

or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

- **Step 5: Monitoring and evaluation.** Monitoring refers to the process of tracking grievances and assessing the progression toward resolution. Each implementing agency would develop and maintaining a grievance register and maintain records of all steps taken to resolve grievances or otherwise respond to feedback and questions.
- **Step 6: Providing Feedback.** This step involves informing those who have raised complaints, concerns or grievances the resolutions to the issues they have raised. Whenever possible, complainants should be informed of the proposed resolution in person, which gives them the opportunity ask follow-up questions which could be answered on the spot for total resolve. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the World Bank, as described below, or through a court of competent jurisdiction.

### **6.3 DISREP Grievance Escalation Process**

#### **GRM Stage One - Specific Implementing DISCO Department Level Resolution**

This stage represents the grievances collection points by specific units of the DISCO implementing agencies. As stated in the six steps framework above, this stage would involve the uptake; collation, sorting and processing; acknowledgement and the resolve as described in stage 4 – verification, investigation and action. All implementing agencies would attempt a full resolve of grievances at this stage as much as practical. A typical example of this stage process is each grievance committee at each unit of the implementing agency activating steps 1 to 4 as stated above to respond to all grievances raised to the institution. The grievance committee at each unit of implementing agencies would deploy all effort as much as practical at this stage to ensure all grievances raised to it has been adequately resolved to the satisfaction of all parties involved. Should the complainant not be satisfied at stage one, the grievances shall be escalated to stage two.

#### **GRM Stage Two – TCN AND BPE Implementing Agency Level Resolution**

The central platform for receiving, sorting and assigning stage two grievance will be located in the respective TCN AND BPE Implementing Agency. Once received, sorted and processed at State Implementing Agency, grievances related to different implementing agencies will be forwarded to the respective agencies. The stage two is a grievance redress platform led by the main implementing agencies. Every implementing agency would establish a grievance management unit which would deal with all the grievances escalated to it from the different units. These implementing agencies would apply the stage four as mentioned under the framework to address and resolve all grievances promptly and communicate the feedback to the complainants. Any complaints or grievances not resolved at this stage shall be escalated to the DISREP Ombudsman.

#### **GRM Stage Three – DISREP Ombudsman Level Resolution (from the Oversight Monitoring Agencies)**



The DISREP Ombudsman shall be formed of key officers from all the Oversight Monitoring implementing agencies. The ombudsman shall be responsible for resolving all grievances escalated to it. The ombudsman shall meet quarterly to review the grievance registers maintained by each implementing agency and use the same to update the grievance dashboard which shall be the compendium of all grievances raised across implementing agencies.

#### **6.4 Grievance logs**

Each implementing agency shall establish a grievance uptake point.

- 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
- If necessary, details of escalation procedure
- Date when the resolution is implemented (if any).

#### **6.5 Screening, Prioritization and Assignment**

Complaints received under the program will be handled as is reasonably practicable, depending on the nature and complexity of the grievance. To expedite the screening process, all incoming grievances will be classified, according to their nature based on the following categories:

- G0: Request for information not directly related to the Project
- G1: Questions / Doubts
- G2: Requests / Petitions
- G3: Complaints

Following this preliminary assessment, DISREP will organize the process of review, validation and (if necessary) investigation of each grievance received, acknowledged and registered.

Grievances will be prioritized according to their severity and complexity level. Table 6.2 shows the priority levels that will be applied:

Table 6.1: Grievance priority classification

Priority Level	Description	Examples
High	Concern, claim or grievance involving stakeholders of high priority, and: <ul style="list-style-type: none"> <li>• Reports a breach to human rights</li> <li>• Relates to a legal non-compliance</li> <li>• Pose a short-term risk to the project continuity,</li> </ul>	<ul style="list-style-type: none"> <li>• Group complaints;</li> <li>• Issues involving third parties (e.g. social, environmental impacts);</li> </ul>
Medium	<ul style="list-style-type: none"> <li>• Concern, claim or grievance from stakeholders (individual or as a group) that could impact the project reputation or compromise its development at medium term.</li> </ul>	<ul style="list-style-type: none"> <li>• Individual complaints;</li> <li>• Issues involving other departments within DISREP program</li> </ul>
Low	<ul style="list-style-type: none"> <li>• Concern, claim or grievance regarding lack of information or unclear information provided.</li> </ul>	Lack of information.

## 6.6 Monitoring and reporting on grievances

Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Program Coordinator. To ensure management oversight of grievance handling, the –Federal Implementing Agency of DISREP (BPE) will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

## 6.7 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a project supported by the World Bank may also complain directly to the Bank through the Bank's Grievance Redress Service (GRS) (<http://projects-beta.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 Nigeria Country Office in Abuja: 102 Yakubu Gowon Crescent, Asokoro , Abuja

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported project. 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 representative/s, and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns.

In addition, project-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, as a result 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).

## CHAPTER SEVEN

### 7.0 MONITORING AND REPORTING

The Stakeholder Engagement Plan will be periodically revised and updated as necessary in the course of the Nigeria DISREP program implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified stakeholders and methods of engagement remain appropriate and effective in relation to the project context and specific stages of the implementation. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. This includes regular refreshers to stakeholders about the grievance mechanism and related processes and regular Project Monitoring reports and reporting to the different stakeholders as appropriate.

#### 7.1 Reporting

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- During the engagement activities: short-term monitoring to allow for adjustments/improvements to be made during engagement; and
- Following completion of all engagement activities: review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

A series of key performance indicators for each stakeholder engagement stage have been developed. Table 7.1 shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Table 7.1: Key Performance Indicators by Project phase

Project Phase	Key activities	Indicator
Preparatory & Planning phase for DISREP	<ul style="list-style-type: none"><li>▪ Preliminary Stakeholder engagement on project designs and anticipated impacts.</li><li>▪ Notification on multi-media (posters, radio, TV, DISREP website)</li><li>▪ Official correspondence</li></ul>	<ul style="list-style-type: none"><li>▪ Stakeholder engagement reports &amp; records of meetings</li><li>▪ Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);</li><li>▪ Frequency of public engagement activities;</li><li>▪ Number of notifications &amp; mode of communication</li><li>▪ Number of letters/emails sent</li></ul>
Project Implementation	<ul style="list-style-type: none"><li>▪ Project Notices issued</li><li>▪ Stakeholders Mapping</li></ul>	<ul style="list-style-type: none"><li>▪ Newspaper clippings, updates on the DISREP website</li><li>▪ Geographical coverage of public engagement activities – number of locations and communities covered by the consultation process;</li></ul>

		<ul style="list-style-type: none"> <li>▪ Number and details of vulnerable individuals involved in consultation meetings;</li> <li>▪ Number of updated versions - at least one updated version within the project cycle</li> </ul>
	Recorded Grievances in the GRM	<ul style="list-style-type: none"> <li>▪ Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;</li> <li>▪ Type of public grievances received;</li> <li>▪ All grievances addressed as per grievance procedure</li> <li>▪ Pending grievances &amp; suggested resolutions</li> </ul>
	<ul style="list-style-type: none"> <li>▪ SEP Implementation</li> <li>▪ Public gatherings</li> </ul>	<ul style="list-style-type: none"> <li>▪ SEP Annual reports</li> <li>▪ Number of public gatherings &amp; records (topics discussed)</li> <li>▪ Number of press materials published/broadcasted in the local, regional, and national media;</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Official correspondence</li> <li>▪ Information Disclosure and External</li> <li>▪ Communication</li> </ul>	<ul style="list-style-type: none"> <li>▪ Number of letters/emails sent</li> <li>▪ % of received communications being answered through the website</li> <li>▪ % of received communications being answered through the email</li> <li>▪ % of answered calls through the telephone exchange.</li> </ul>
Project Completion	SEP implementation Project	<ul style="list-style-type: none"> <li>▪ SEP Final Report</li> </ul>

## 7.2 Stakeholder Involvement in Project Monitoring

The Involvement of project-affected stakeholders in the monitoring process will promote transparency and support in addressing stakeholder concerns. Stakeholder participation in monitoring can also empower communities as it enables them to have a role in addressing Project-related issues that affect their lives. This, in turn, strengthens relationships between the Project and its stakeholders.

Stakeholder involvement in monitoring of this Project will include the following:

- Involvement of affected stakeholders when selecting sampling methods for any social surveys or external impact assessments, and in the analysis of results. Training will be conducted where needed to build capacities.
- Observations of monitoring and audit activities by affected parties.
- Grievance follow-up meetings and calls with affected stakeholders.

## 7.3 Ongoing Reporting to Stakeholders

DISREP will produce reports for use by project stakeholders at stipulated intervals and through specified mechanisms. Reports from various departments will be reviewed and appropriate information presented in synthesized reports to various stakeholders. The modes of reporting shall be as outlined below:

Table 7.2: Outline of Reports to Stakeholders

Report	Content	Stakeholder	Frequency
Technical reports (Financial, Occupational Safety and Health Report, Environmental and Social Audit, Personnel)	Technical Evaluation of the Programmes status	Regulatory authorities	At agreed timeline
Progress Update Reports and Annual report	<ul style="list-style-type: none"> <li>• Project development activities,</li> <li>• challenges and opportunities,</li> <li>• local workers hiring status</li> </ul>	<ul style="list-style-type: none"> <li>• Federal and State Implementing Agencies</li> <li>• World Bank</li> </ul>	Quarterly, Six months after effectiveness date and other agreed timeline
Media release	Main Project milestones	Local media (and national media as appropriate)	At agreed timeline

#### 7.4 Training

DISREP implementing agencies will arrange community & stakeholder engagement overview, principles, tools and goals associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with stakeholder grievances as per the Public Grievance Procedure. Annex 3 has indicative outline for the proposed stakeholder engagement training.

Project contractors and selected representatives will also receive necessary instructions for the Grievance Procedure.

## ANNEXES

### ANNEX 1: Proposed Budget Line Items for Stakeholder Engagement

S/No.	Item
1.	Stakeholder Engagement in programme locations
2	Virtual online meetings/ internet with project stakeholders and state counterparts
3.	Town-hall meetings in Locations where DISREP platform Project exist
4.	2-Day Primary Stakeholders retreat
5,	Subsidiary staffing of the social unit (Salary)
6.	Stakeholder consultative Forum
7	Production of National Jingles for Television and Radio
8	Production of Newsletter
	Programme information kit
10	Weekly Sponsored radio Programme
11	Purchase of audio visual and Public Address systems
12	Purchase of camera
13	Purchase of publicity vans Registration & Insurance
14	Maintenance of Vehicles & Fuelling
15.	Miscellaneous (Printing etc.)
16	Toll free number
17	Purchase of face mask, hand sanitizer / sanitation facilities and temperature testing equipment's.

### ANNEX 2: NERC Customer Classification Index

	Customer Classification	Description	Remarks
<b>1</b>	<b>Residential</b>		
	R1	Life-Line (50 kWh)	A consumer who uses his premises exclusively as a residence - house, flat or multi-storied house where people reside.
	R2	Single and 3phase	
	R3	LV Maximum Demand	
	R4	HV Maximum Demand (11/33 KV)	
<b>2</b>	<b>Commercial</b>		
	C1	Single and 3phase	A consumer who uses his premises for any purpose other than exclusively as a residence or as a factory for manufacturing goods.
	C2	LV Maximum Demand	
	C3	HV Maximum Demand(11/33 KV)	

<b>5</b>	<b>Industrial</b>		A consumer who uses his premises for manufacturing goods including welding and ironmongery.
	D1	Single and 3phase	
	D2	LV Maximum Demand	
	D3	HV maximum Demand (11/33 KV)	
<b>4</b>	<b>Special</b>		Customers such as agriculture (agro-allied enterprises involving processing are excluded), water boards, religious houses, Government and teaching hospitals, Government research institutes and educational establishments.
	A1	Single and 3 Phase	
	A2	LV Maximum Demand	
	A3	HV Maximum Demand (11/33 KV)	
<b>5</b>	<b>Street Lighting</b>		
	S1	Single and 3phase	



## **ANNEX 3: PROPOSED TRAINING OUTLINE**

### **Community & Stakeholder Engagement Overview**

- Setting the scene – The theory of change,
- How to Identify Stakeholders Through Impact Zoning?
- Core Values for the Practice of Public Participation
- What Makes Communities “Trust” a Company?
- Tips for Engaging when Authorities do not Allow Communities to Organize Themselves
- References on Participatory Methods and Techniques
- References on Gender and Engagement.
- Using Software Programs to Track Stakeholder Consultation and Commitments.
- A brief history of community/stakeholder engagement processes on existing project or participating state
- Politics and the roles of community/stakeholder engagement
- Changing emphasis in policy development – Accountability, transparency and involvement of social license to operate
- Increasing stakeholder consultation expectations

### **Community Engagement Principles**

- Levels and principles of community/stakeholder engagement
- The importance of early identification of the purpose and function of community/stakeholder engagement
- Different levels of community/stakeholder engagement – ranging from information to participation to partnership
- Is there a difference between community engagement and stakeholder engagement?

### **Overview & Introduction**

- Current skills inventory for community/stakeholder engagement
- Good and bad experiences of community/stakeholder engagement
- Identification of current community/stakeholder engagement process focus areas

### **Practical Case Examinations**

- At the beginning of the course, participants will put forward examples from their own work situations as possible case studies
- Participants will be able to choose to work on their own consultation plan relevant to their project or participate in group selected most applicable case studies to work through using a practical set of principles and approaches for stakeholder engagement and the tools they have gained through the course

### **Effective community engagement**

- The community engagement approach framework – an overview
- How the framework provides a structure for planning
- The links between different sections of the framework

- How to use the framework in the work situation
- stakeholder engagement strategy
- Create a human rights based model of stakeholder consultation underpinned by community engagement international best practice and regulatory compliance

#### **Engagement Levels, Goals & Communication Levels**

- What type of engagement is needed? – the process of making decisions depending on your desired outcomes
- Clarifying what is to be achieved by community/stakeholder engagement – intra-organisational consultation
- Ensuring that the community/stakeholder engagement goals are clearly articulated
- Working up and down within in an organisation to ensure agreement on these goals

#### **Risk Assessments & Conflict Management**

- Assessing risks and benefits
- Identifying different risk categories
- Likelihood of conflict in the absence of community/stakeholder engagement
- Possible impact of conflict
- Assessment of likelihood of conflict arising during community/stakeholder engagement
- Use of a Risk Assessment Tool for community/stakeholder engagement
- Managing risks – which risks can be avoided and which must be managed
- Planning the community/stakeholder engagement process to avoid unnecessary conflict
- Where conflict is inevitable, how to ensure it is managed to achieve the most useful outcomes

#### **Stakeholder Management and consultation**

- Develop, plan, implement, review and benchmark stakeholder and community engagement programs
- Tailor engagement approaches to respond to diversity and mitigating emerging conflict
- Case study examples will be discussed, based on real life community/stakeholder engagement processes

#### **Resource Allocation & Budgeting**

- A standardised budget will be customised for the needs of individual participants and the organisational budgets. It will include all the line items for
  - consideration in a community/ stakeholder engagement process
  - Identifying social investment strategy opportunities which enhance community relationships
  - Influencing organisational stakeholder consultation change

#### **Putting it all Together & Communication Tools**

- Communicating clearly – key points
- Communicating via different media – visual, verbal, written
- Using different tools – pamphlets, papers, internet, email, fax, face to face
- What not to do – examples of bad communication and what effect that has on recipients

- Building skills in working with a diversity of people and groups
- When and how to employ professionals/consultants

#### **Review**

- Review – identification of key learning points for each individual participant
- What will this mean for your first week back at work?
- What strategies will you use to influence organisational stakeholder consultation change?

## **ANNEX 4: POINTS OF CONTACT**

Information on the project and future stakeholder engagement programs will be available on the project's website and will be posted on information boards in the respective project implementation Units

The point of contact(s) regarding the stakeholder engagement program are:

### **Federal Ministry of Finance**

<b>Description</b>	<b>Contact details to be determined (add the contact details once available)</b>
Name and position	
Address:	Federal Ministry of Finance, Abuja
E-mail:	
Telephone:	To be provided

### **Federal Ministry of Power and Steel/ NERC**

<b>Description</b>	<b>Contact details</b>
Name and position	
Address:	Federal Ministry of Power/ NERC
E-mail:	
Telephone:	To be provided

### **Federal Ministry of Environment**

<b>Description</b>	<b>Contact details</b>
Name and position	
Address:	
E-mail:	
Telephone:	To be provided

### **Implementing Agency of DISREP (BPE)**

Description	Contact details
Name and position	
Address:	
E-mail:	
Telephone:	To be provided

## DISCOs

Description	Contact details
Name and position	
Address:	
E-mail:	
Telephone:	To be provided