

The Republic of South Sudan

**Ministry of Information, Communication Technology
and Postal Services (MICT&PS)**

**Eastern Africa Regional Digital Integration Project
(P176181)**

Stakeholder Engagement Plan

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List of Acronyms and Abbreviations

ADB	African Development Bank
BDC	Boma Development Council
CAR	Central African Republic
CPA	Comprehensive Peace Agreement
CSO	Civil Society Organization
DRC	Democratic Republic of Congo
E&S	Environmental & Social
EA-RDIP	Eastern African Regional Digital Integration Project
ECRP	Enhancing Community Resilience and Local Governance Project
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FGD	Focus Group Discussions
FM	Financial Management
GBV	Gender Based Violence
GDP	Gross Domestic Product
GIZ	Gesellschaft für Technische Zusammenarbeit
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
ICT	Information and Communications Technology
IDP	Internally Displaced Person
IGAD	Intergovernmental Authority on Development
IP	Implementing Partner
ISP	Internet Service Provider
IVA	Independent Verification Agent
IXP	Internet Exchange Point
JICA	Japanese International Cooperation Agency
LGA	Local Governance Act
M&E	Monitoring & Evaluation
MDA	Ministries, Departments and Agencies
MICT&PS	Ministry of Information, Communication Technology and Postal Services
MNO	Mobile Networks Operator
MoFP	Ministry of Finance and Planning
NCA	National Communications Authority
NGO	Non-Governmental Organization
NTC	National Technical Committee
NPSC	National Project Steering Committee
OECD	Organization for Economic Co-operation and Development
OPWG	Optical ground wire
PAP	Project-Affected Person
PIU	Project Implementation Unit
PDC	Payam Development Council

PDO	Project Development Objective
POM	Project Operations Manual
RAN	Radio Access Network
RAP	Resettlement Action Plan
REC	Regional Economic Community
REN	Research and education networks
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SSIGW	South Sudan International Gateway
TA	Technical Assistance
TVET	Technical and Vocational Education and Training
UN	United Nations
UNDP	United Nations Development Programme
UNESCO	United Nations Educational, Scientific and Cultural Organization
WB	World Bank

1. Introduction

The Republic of South Sudan is a low-income country, which achieved independence from Sudan in 2011. However, independence was followed by six years of civil war (2013-2018), resulting in a loss of GDP equivalent to US\$ 81.1 billion.¹ With per capita GDP of US\$303, and approximately 80 percent of the 13.3 million population living in extreme poverty, South Sudan is among the least developed countries in the world. In 2018, a peace agreement was signed and a transitional government was established. The transitional government has set ambitious plans for economic revival² with renewed support from development partners. South Sudan's economy is expected to record an economic recovery, reflecting the impact of political stability, a rebound in oil prices, and fiscal consolidation efforts.

South Sudan's ICT sector has the potential to become a significant contributor to the economy. ICT sector revenues amounted to only US\$200 million during 2020-21,³ and the country wishes to develop this sector further. The deployment of the Juba-Uganda cross-border fiber optic cable in 2021 connected South Sudan to the international internet network for the first time, leading to an increase in internet, smartphone, and mobile money usage,⁴ which has created momentum for further broadband adoption. A government e-services portal has been established for key services such as e-visa, e-tax, and others. Institutional governance is in place, with the Ministry of ICT and Postal Services (MICT&PS) and telecom regulator National Communications Authority (NCA) spearheading the ICT Agenda.

The World Bank and the Government of South Sudan are currently in the process of planning the 'South Sudan Regional Digital Integration Project' as part of the 'Eastern African Regional Digital Integration Project' (EA-RDIP). The project aims to promote the establishment of an integrated digital market across the Eastern Africa region by increasing the cross-border flow of broadband, data traffic and digital services; and to advance regional digital market integration through increasing access to broadband connectivity and strengthening the enabling environment for digital service delivery.

The World Bank's Environmental and Social Standard 10⁵ recognizes the importance of open and transparent engagement with all project stakeholders, based on the recognition that effective

¹ Between 2012 and 2018, World Bank (internal draft). The Economic Cost of Conflict: Evidence from South Sudan. Technical background report. The Dynamics of South Sudan's Conflict Economy [P169121].

² The government has pledged to take forward comprehensive economic, governance, and PFM reforms as outlined in Chapter IV of the 2018 R-ARCSS agreement. Recent efforts already taken by the government include, for example, establishing the Public Financial Management Reform Strategy (PFMRS) and its governance structures.

³ ICT sector revenue was estimated based on annual revenues submitted to the National Communication Authority (NCA) and the Universal Service and Access Fund (USAF) by two (2) mobile network operators and eight (8) internet service providers for FY 2021/21. The NCA and USAF used this information to calculate mandatory fees and levies as stipulated in the National Communication Act 2012.

⁴ Doubling of internet penetration to 9 percent and smartphone adoption to 4 percent of the population since 2014 and 2019, respectively.

⁵ The World Bank, Environmental and Social Framework (ESF), 2018.

stakeholder engagement can improve E&S sustainability of project activities, enhance project acceptance, and implementation, and allow stakeholders to contribute to project design. The key objectives of stakeholder engagement include a) an assessment of the level of interest and support of the project by stakeholders to promote effective and inclusive engagement with all project-affected parties and b) to ensure that project information on E&S risks and impacts is disclosed in a timely and understandable way.

This Stakeholder Engagement Plan (SEP) is designed to anchor all South Sudan EA-RDIP stakeholder engagement in a systematic way. It defines legal and policy requirements in regard to stakeholder engagements, lists stakeholder engagements that have already been undertaken, provides a stakeholder analysis of all relevant project-affected parties to the EA-RDIP and lays out the means of dissemination of information to different parties as well as means and ways to continue to consult different stakeholder groups throughout the project cycle. Furthermore, it contains a monitoring plan for the implementation of the SEP.

2. Project Components

The EA-RDIP in South Sudan has four Components:

Component 1: Connectivity Market Development and Integration

Sub-component 1.1: Cross-border and backbone network connectivity

This sub-component will support the deployment of up to 2,400 km of new fiber optic cables along prioritized routes, bringing in, initially, an additional 11% of the population under broadband access (table A5.2). A feasibility study will inform the design of fiber layout (underground, aerial, or via optical ground wire (OPGW)) along the power grid for the prioritized routes.

Subsidies will be provided for the deployment of new fiber networks, where needed, and will be awarded to selected providers who will be expected to co-finance, design, build,⁶ and operate network infrastructure deployment on an open access basis at reasonable rates. Befitting PPP arrangements will be defined as needed. Transaction advisory services and feasibility studies will be financed to determine the modality⁷ of subsidies (likely through ‘reverse auctions,’⁸ other models), and potential financing arrangements (e.g., PPPs). The subsidies are expected to be partial (less than 100%) thereby facilitating private capital mobilization.

Sub-component 1.2: Last mile connectivity including in borderland areas

This sub-component will connect remote, rural, borderland locations where the commercial incentive for last-mile network expansion is insufficient. Financing will be provided towards connecting population centers, public institutions along the fiber route and establishing low-cost portable, emergency response options of Wi-Fi hotspots, nomadic RANs, network transceivers in host communities and IDP/refugees camps in borderland areas. A similar model of subsidies as described above (sub-component 1.1) or other models such as demand aggregation by pre-purchasing capacity⁹ will be used for private capital mobilization.

Sub-component 1.3: Enabling legal, regulatory and institutional ICT environment

⁶ Construction is expected to be led by the private sector covering passive (for example, ducts) and active infrastructure (fiber cores), with rights of way and dig-once obligations.

⁷ This will cover (a) legal considerations; (b) decision making, including possible changes to contracts; (c) monitoring, investigative, and sanctioning arrangements in place for the duration of the contract(s), with potential avenues for claw-backs; and (d) how the awarded contract(s) can be future-proofed to minimize the risk of disputes and possible appeals mechanism(s).

⁸ The bidding process will designate targeted geographical areas (in clusters or lots) where interested operators are invited to bid competitively for the lowest amount required to upgrade and/or provide new services in the designated area.

⁹ Upfront purchase of internet bandwidth from private sector operators, under indefeasible right of use operating expenses contracts, spanning 5-15 years, will serve as the investment guarantee needed to incentivize private sector capital expenses investment in the rollout of last-mile access networks that connect targeted locations, but also benefit the wider consumer base in the vicinity of connected locations, with the Government of South Sudan serving as the anchor tenant required for enhanced service provision. Although any lease of capacity would be expected to extend for a 5–15-year period, any operations and maintenance costs that go beyond the closing date of the project, as well as additional bandwidth purchased after the closing date, would fall under the responsibility of the Government of South Sudan.

This sub-component will support the modernization of policy, legal, regulatory, and institutional frameworks governing the telecoms sector, with financing for related TA, capacity building, training, and equipment acquisition needed to support reforms.

Component 2: Data Market Development and Integration

Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity

This sub-component will strengthen and harmonize cybersecurity frameworks, build capacity for responding to cyber threats/cybercrimes and create greater awareness on cyber security, particularly in the financial sector.

Sub-component 2.2: Data exchange, governance and protection

This sub-component will improve the routing efficiency of data transmitted and build resilience for government data storage. Financing support to establish new internet exchange points (IXPs) in strategic locations (north border Renk, Juba) and creating data-backups through public cloud subscription will also enable disaster risk management. Technical assistance would be provided on policies and institutional governance for data protection policies.

Component 3: Online Market Development and Integration

Sub-component 3.1: Digital cross-border trade, payment and service enablers.

This sub-component will support the development of cross-border digital services through e-payments, and a portal for citizen feedback/seeking recourse with an aim to expand adoption of e-services. Support to build readiness for partaking in regional trade initiatives will be provided.

Sub-component 3.2: Regional research and education networks (RENs), and training for digital skills.

This sub-component will strengthen the higher educational network through the establishment of a REN and integration with regional RENs allowing for network economies and knowledge transfer. Relatedly, leveraging enhanced capacity of universities through RENs and in partnership with the government, digital learning programs would be conducted for civil servants and university students.

Component 4: Project Management and Implementation Support

This component will finance the establishment and operations of the PIU at MICT&PS for project implementation. Implementation entails functions of project management and coordination, including procurement, financial management (FM), and M&E, as well as environmental and social risk management.

2.1. [Project Locations and Beneficiaries](#)

While the majority of activities will be undertaken at the national level, the establishment of fiber optic links in the country will cover the following routes:

Table 1 Priority fiber optic links

Route	Kms of Fiber	No. of 2G RAN sites upgraded to 3G/4G	Additional population covered (%)
Juba to Nadapal/ Kenya border (A-B)	361	16	2%
Juba to Upper Nile border Northeast Backbone (A-C)	883	57	5%
Juba to Northern Bhar El Ghazal Northwest Backbone (A-D)	820	51	2%
Wau area to Unity Backbone (2-E)	357	19	2%
Total	2,421	143	11%

Source: World Bank and TMG. 2022. Horn of Africa Missing Links Study (P176181), World Bank (forthcoming) Digital Economy for Africa South Sudan (P176361)

The project will benefit citizens, refugees, Internally Displaced Persons, businesses, public sector Ministries, Departments and Agencies (MDAs) through improved access to connectivity, an environment enabling digital services and provision of digital skills.

Citizens. Citizens in rural and borderland communities, including women, will benefit from wider opportunities to participate in the digital economy through activities that promote digital inclusion. Network coverage for mobile broadband is expected to be expanded to at least 45 percent in South Sudan. Of the beneficiaries that will directly receive training on digital skills at least 30 percent women will be included.

Refugees, and IDPs. Refugees, IDPs and people in host communities, will be supported through connectivity coverage, and wider host communities will benefit from community wide impact of increased connectivity. Beyond connectivity coverage, access to mobile and emergency response ICT infrastructure would allow for emergency-response.

Businesses. Commercial ICT service providers, including mobile network operators (MNOs) and internet service providers (ISPs), will directly benefit from the project through contracts for infrastructure deployment and capacity purchase as well as local IT procurement. Other businesses are indirect beneficiaries, who will benefit from the reforms supported, including a secure environment for online services and wider network coverage.

Public sector. The main direct beneficiaries of the project include the Ministry of Information and Communication Technologies and Postal Services (MICT&PS), and the National Communications Authority (NCA) that will receive targeted financial and technical assistance. However, public institutions (including unconnected government offices, healthcare centers, schools, universities,

TVETs) will also benefit from improved access to connectivity and access to shared digital infrastructure (e.g., IXPs, data hosting solutions). In addition, civil servants, including female staff will be trained in management or use of digital systems and digital skills.

2.2. Institutional Arrangements

A dedicated PIU will be established and maintained within MICT&PS, which will serve as the main implementing agency. In the long run, the PIU is expected to migrate to the planned ICT Agency (which may be established through the project). The PIU will be responsible for project implementation, including core project-related fiduciary functions, M&E and E&S commitments. In addition, the PIU will also act as the single point of contact for the regional PIUs at IGAD and The PIU will submit project reporting to the National Project Steering Committee (NPSC), the National Technical Committee (NTC) as well as to the World Bank and engage with the NTC on specific matters requiring technical expertise/input on an ad-hoc basis. It will include a Social Specialist as part of the Environmental and Social (E&S) risk management team. The Social Specialist will coordinate and implement this SEP, while the Project Manager will have the overall responsibility for stakeholder engagement.

2.3. Objectives and Scope of the SEP

The SEP seeks to define a structured, purposeful and culturally appropriate approach to consultation and disclosure of information, in accordance with ESS 10. It recognizes the diverse and varied interests and expectations of project stakeholders and seeks to develop an approach for reaching each of the stakeholders in the different capacities at which they interface with the project. The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders leading to improved decision making. Overall, this SEP will serve the following purposes: stakeholder identification and analysis; planning engagement modalities through effective communication, consultations and disclosure; enabling platforms for influencing decisions; define roles and responsibilities for the implementation of the SEP; define reporting and monitoring measures to ensure the effectiveness of the SEP; and elaborating on the role of grievance redress mechanism (GRM).

2.4. Previous Stakeholder Engagement Activities

A series of in-person and virtual technical discussions with stakeholders have been held during project preparations in order to receive stakeholders' views and inputs into the Project and to consult stakeholders on potential environmental and social risks and impacts and appropriate mitigation measures.

South Sudan Country Diagnostic Mission: During the South Sudan Country Diagnostic Mission from February 21-25, the World Bank team consulted with a broad array of stakeholders, including from the Ministry of Information; Communications Technology and Postal Services (MICT&PS); the National Communications Authority (NCA); Ministry of Gender, Social Welfare, and Religious Affairs; private sector entities; UN partners and multilaterals; the Chamber of Commerce; Industry and Agriculture; Ministry of Trade and Industry; Ministry of General Education; universities and educational centers (University of Juba and Kampala University); Telecom providers; accelerators, incubators, start-ups, early stage tech businesses and digital training providers; insurance providers, public and private commercial banks; ISPs; digital public platforms; fintech players and digital businesses; telecom regulator and implementing authorities; digital businesses; Go Girls ICT Initiative; UN Women; South Sudan Women's Entrepreneurs' Association; and South Sudan Women Finance (see Annex 1 for a list of stakeholders consulted).

The main objective of these stakeholder meetings was to assess the state of digital economy in South Sudan and determine the Government's needs for further technical assistance and possible future investments. Mission objectives included the consultations with key government, private sector and academic stakeholders on Project modalities.

Consultation results indicated that affordable, accessible and reliable internet connectivity is the highest priority for the government to address. At present the connectivity via a single route to Juba is creating a risky dependency; most states face the risk of digital exclusion in the absence of government support for the expansion of private sector investments; ICT institutional and governance arrangements exist but lack sufficient capacity; and the telecom regulator could use TA on creating a more conclusive and effective regulatory frameworks. Stakeholders consulted broadly acknowledged that investing in expanding connectivity can have a wide ranging economic benefit for the country.

Stakeholders pointed out that South Sudan was the only country without an expansive national backbone fiber connection and lacked international redundancy. This means that internet penetration is one of the lowest in the world and broadband processes are among the most expensive. At the same time, the ICT governance and regulatory environment is not entirely conducive to attract infrastructure investments. Stakeholders indicated that there is high dependency on the single Juba route, international redundancy can be built through reviving the fiber link to Sudan, connecting to Kenya and subsequently connecting to Ethiopia, DRC and CAR. At the same time, the quality of internet and international capacity in the south can be improved through carrier-neutral data centers that also function as Internet Exchange Points (IXP).

Asked about digital skills existing, stakeholders indicated that without national statistics or third-party surveys it is difficult to tabulate the level of digital literacy. Consultations revealed this is low due to several challenges in the sector. While an ICT curriculum is introduced at schools, this is the only one at secondary level and the majority of children remain out of school in any case. The curriculum provides basic skills in computer science; however, there is a lack of computers

and ICT infrastructure at schools. The majority of children are out of school in South Sudan, and thereby there is limited access to any training on digital skills.

Consulted universities stated that they are offering ICT courses at the undergraduate level. However, this service is mainly focused on Juba. The University of Juba and the Kampala University both have basic ICT infrastructure. The Project responded that it was considering a digital skills competency framework to better define and measure the level of digital skills; and to introduce computer science curriculum from the primary education level instead of starting from secondary level.

The Government of South Sudan has recognized the role of digital public platforms in increasing the efficiency and effectiveness of policy design and implementation. It has introduced an e-service platform. However, the platform has suffered from limited interoperability of backend systems, and the absence of a centralized data management system in the country renders data hosting on the platform difficult.

Furthermore, the lack of a consolidated digital government strategy has led to a scattered and siloed understanding of digital development among MDAs. The Project responded with considerations with regard to developing a national vision for digital government; expanding connectivity in government offices; and investments in systems.

Other issues discussed included digital financial services. Stakeholders indicated that these are at an early stage in the country in terms of market development, and availability of supporting infrastructures. Progress is limited by the constraints of 'hard' infrastructure. This is accompanied by missing legal and regulatory frameworks, the lack of basic financial markets. Underinvestment and the lack of appropriate financial products. The Project strongly recommended to address the regulatory and infrastructural gaps.

Asked about digital businesses, stakeholders indicated that there is limited information on the size and nature of such. Consultations showed, however, that digital businesses have been revealed in the last five years. Given the absence of national statistics it is therefore key to continue stakeholder consultations with development partners, NGOs, government agencies, business associations and NGOs to better understand the landscape. Currently, the digital business support ecosystem comprises mainly incubators, led by the private sector or other donor agencies, with limited government support.

Consultations with women's associations and businesses showed that gender disparities are generally staggering in South Sudan – which can be seen in the ICT sector. While there are no gender statistics in the ICT sector, consultations showed the existence of a gender gap. For example, in schools, more boys enroll in ICT courses than girls. Stakeholders expressed that ICT is generally not seen as a women's career option. More girls drop out of ICT programs than boys. Stakeholders also indicated a 'lack of female role model effect in the classroom'. Outside of the classroom, women face barriers in accessing ICT infrastructure such as devices or internet because they have lower purchasing power and mobility.

A Project preparation mission for the regional part of the project was held in the region from September 26 – 30, 2022, including a regional level workshop from September 26-27, 2022 in Arusha, Tanzania. Consulted stakeholders included representatives from the Ministry of Trade and Industry in South Sudan; the Ministry of Industrialization, Trade and Enterprise Development in Kenya; the Ministry of ICT and Innovation in Rwanda; the Telecommunications Regulatory and Control Agency in Burundi; the Ministry of East African Community Affairs from Uganda; Ministry of Information, Communications and Information Technology in Tanzania; the East African Community (EAC); and the East Africa Health Research Commission. Key objectives of the mission were to hold a validation workshop at the East African Community (EAC) with technical counterparts from Partner States on a draft regional digital roadmap and proposed priority areas for its implementation; confirm activities to be financed by the project and implemented by the EAC; discuss coordination mechanisms and refine implementation arrangements at the EAC, and kickstart the required fiduciary assessments for the project.

During the workshop, the Republic of Burundi welcomed the project initiative and informed that it had adopted a National Strategic Plan for the Development of E-Commerce in line with the EAC E-Commerce Strategy. The Republic of Kenya noted that the project initiative was conceived at an appropriate time following the adoption of the EAC E-Commerce Strategy, which aims at enhancing capacities for growth, improving legal and regulatory frameworks, and increasing trust in digital trade. It informed that the country had undertaken an E-Readiness study, which has informed the development of a national draft E-Commerce Strategy. It also informed that several other initiatives, such as the Horn of Africa Cable and Eldoret-Nadapal Projects are ongoing. The United Republic of Tanzania stated that the country was in progress of developing an E-Commerce Strategy and National Digital Economy Framework. The Republic of Uganda called on all partner states to ensure that national strategies are aligned with regional ones. The Republic of South Sudan affirmed that the development of a regional framework will guide the partner states in the development of national laws and regulations.

Stakeholders further made the observation that regional digital inclusion also empowers youth, persons with disabilities, and women; technology costs on data roaming is currently very high and there is need to reduce costs with a view to establishing seamless connectivity across the region; there is need to develop national strategies that will address the impact of natural disasters and climate change on connectivity infrastructure; and there is need to develop and implement a regional framework for regulatory oversight of postal services and national addressing systems in the region to facilitate e-commerce. Furthermore, interoperability of postal systems, regional control rooms in customs, and e-commerce superhighways of the regions need to be promoted. Capacity development, regional repositories, online training modules and tools, knowledge sharing and skills development are required. In addition, ICT data collection and national statistics need to be enhanced. The Project aims to fill these gaps.

In view of e-payments, stakeholders emphasized the need to establish interoperability of the mobile payment system across the region, as well as other payment systems in the world. E-signature recognition in the region should be established to better facilitate e-commerce and

intra-regional trade and subsequent participation in the African Continental Free Trade Area. E-signature was pointed out to be important also for improving custom procedures as recognized by the Trade Facilitation Agreement of the WTO. In view of online customary protection, the establishment of in-line consumer protection guidelines under the e-Commerce protocol should be informed and should be brought in line with the OECD guidelines.

In regards to data protection, Kenya, Uganda and Rwanda featured strongly with their data protection laws and monitoring institutions. The Project will address data protection by focusing on key priorities: interoperability of laws and regulations of data protection and cross-border data to foster a more integrated regional digital market; development of a framework for data protection in a manner that fosters a data interoperability across the region; a mechanism that facilitates the safe sharing of data; and ensuring data protection to ensure the trust of users.

Stakeholders further raised concerns of cyber security. This will be addressed by the Project by enabling cross-border business activity through harmonized cybersecurity legislation, policies and standards. Furthermore, the Project will help to protect East Africa's networks, platforms, applications and services from attacks. It will protect East Africa's GDP from losses through cybercrime. It will create a reliable and trustworthy regional enabling environment for investment and support the sharing of threats and incidents.

Consulted stakeholders made the following observations regarding cybersecurity: There is a need for uniform understanding of terms, such as person or non-personal data; challenges occur when criminal activity crosses jurisdictions; cybersecurity should not be achieved at the expense of other rights; there is a skills gap in cybersecurity; it needs to be ensured that the protection of children and persons with disabilities is well incorporated. The Project will aim to address these issues.

Project Preparation Mission: During the broader regional Project Preparation Mission to Addis Ababa, August 30 to September 30, 2022 the World Bank team and a team from the Government of South Sudan consulted with a variety of stakeholders, including from the Regional Economic Communities (RECs), Intergovernmental Authority on Development (IGAD) and the East African Community (EAC).

In addition to this broader regional mission, a reverse mission for South Sudan was held from September 2-9, 2022. During the reverse mission, consulted stakeholders included representatives of the MICT&PS, Ministry of Finance and Planning (MoFP), National Communications Authority (NCA), National Revenue Authority; Ministry of Higher Education, Science and Technology; and the CEO from the South Sudan International Gateway (SSIGW) (see Annex 1). The mission included cross-country exchanges and dialogues between Ethiopia, Somalia and South Sudan, in which countries committed to regional digital integration. Furthermore, consultations indicated that private sector participation in financing for infrastructure development is critical to fill any financing gaps.

3. Legislative and Policy Requirements

The South Sudan Access to Information Act No. 65 of 2013 spells out that every citizen shall have the right of access to information. It focuses on the right to access information held by public bodies in South Sudan. The purpose of the Act is to give effect to the constitutional right of access to information, promote maximum disclosure of information in the public interest and establish effective mechanisms to secure that right.

The Environment Policy of South Sudan, from 2016, provides guidelines for a wide range of responses to environmental management. These include the promotion of effective, widespread, and public participation in the conservation and management of the environment.

The World Bank's ESS 10 sets out that a borrower has to engage with stakeholders as an integral part of a project's environmental and social assessment and project design and implementation. The nature, scope and frequency of the engagement should be proportional to the nature and scale of the project. Consultations with stakeholders have to be meaningful and be based on stakeholder identification and analysis, plans on how to engage stakeholders, disclosure of information, actual consultations, as well as responses to stakeholder grievances and reporting back to stakeholders.¹⁰

Key objectives of ESS 10 are the establishment of a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship; assessment of the level of stakeholder interest and support for the project and for the integration of stakeholders' views in design and understanding of E&S risks and impacts; provision of effective and inclusive engagement with project-affected persons throughout the project lifespan; disclosure of project information on E&S social risks and impacts; and provision of accessible and inclusive means to file grievances for project-affected persons.

ESS 10 prescribes the identification and analysis of stakeholders as the first step in the engagement of stakeholders during project preparation. The Borrower is called to identify different stakeholders, including project-affected parties, as well as interested parties. In particular, the Borrower has to identify stakeholder groups that are vulnerable or disadvantaged. In the stakeholder engagement plan, the Borrower will lay out timings and methods of the engagement with the different stakeholder groups that have been identified.

¹⁰ World Bank, Environmental and Social Framework. Setting Environmental and Social Standards for Investment Project Financing, August 2016.

4. Stakeholder Identification and Analysis

While not every affected party will also be a beneficiary, it is crucial to disseminate information and engage with all stakeholders on project modalities, including local communities which are in the vicinity of construction activities. Stakeholders are categorized generally as ‘project-affected’ parties or those that may have an interest in the project, which will be identified as ‘other interested’ parties. Furthermore, it is important that all processes of information disclosure and consultations are as inclusive as possible to ensure that all sections of the affected communities will benefit from the project, and women, youth, refugees and other vulnerable groups are not excluded.

4.1. Ethnic Groups and Community Structures and Organizations

South Sudan consists of a broad variety of ethno-linguistic groups. Those entail three subcategories of speakers of the Nilo-Saharan language family: speakers of *West Nilotic* languages (Dinka, Nuer, Atuot); speakers of *Western Nilotic / Luo* languages (Shilluk, Annuak, Maban in Upper Nile and Ethiopian borderlands, Acholi in Eastern Equatoria, and Luo in Western Bahr el-Ghazal); and speakers of *Eastern Nilotic* languages (Eastern and Central Equatoria: Bari, Lotuho and Teso). Furthermore, there are speakers of the *Niger-Congo* language family, including the Zande in Western Equatoria.¹¹

However, ethnic groups can be heterogeneous. As different experiences in the recent civil war have shown, those differences can even occur in the same localities. Many of the recent clashes have taken place in an intra-ethnic manner, such as among Nuer clans in Unity State. Furthermore, some of the ethnic groups above are smaller in number or have less political influence at the central level. Most importantly, however, at the local level, some may form majorities in some of the counties, while they are minorities in others. It hence needs to be determined in each specific context which group constitutes an ‘ethnic minority’. Different groups also adhere to different types of social structure.

For pastoralists, such as the Nilotic Dinka, Nuer and Atuot the search for pasture shapes most of their socio-cultural life. They may migrate from homesteads on high grounds in the wet season to mobile cattle camps on the dried-out swamps in the dry season. Closely linked to this lifestyle is a social structure, which gives preference to an ‘acephalous’ (‘headless’) socio-political organization rather than a central authority. Similarly, systems of exchange are based on social connections established through marriage rather than open markets.¹²

¹¹ Joseph H. Greenberg (ed.), *Universals of Human Language*, Cambridge Mass. MIT Press, 1963

¹² Naomi Pendle, Marco Pfister, Martina Satschi, Mareike Schomerus, Danielle Stein, Eddie Thomas and Craig Valters, “Local Socio-Political Organization and Implications for Community-Driven Development in South Sudan: An Analysis of Existing Literature”, prepared for the World Bank, unpublished, 2012, p. 14.

Farming communities, on the other hand, adhere to a settled lifestyle. This usually goes along with central authority and/or hierarchical leadership structures, such as kingdoms or provincial chiefs (the latter were often historically instated by foreign rulers). For example, early accounts of the Zande kingdom around Yambio showed state-like elements, such as tribute paying, taxation or the death penalty. Both the Shilluk and Anuak (Luo speakers) had systems of sacral kingship, which differed from the secular authoritarianism of the Zande state.

In many cases ‘traditional’ authorities were invented or established by foreign rulers in order to act as intermediaries for taxation, labor mobilization, and other forms of coercion. This was especially instrumental vis-à-vis the acephalous societies, as they were otherwise difficult to engage. Careful contextual analysis can create understanding about the actual representativeness of ‘traditional authorities’ for a community. Alongside these instated authorities existed other and older forms of authorities, which were based on local concepts of origin, power and authority.¹³ Many of the different forms of social structures in South Sudan are therefore based on the kinship concepts of a ‘segment’ or a lineage. Wealth is still a major marker in the social strata and the size of cattle herds – among the pastoralist societies – is a significant indicator for wealth.

‘Civil society’, however, is a difficult term, as most people belong to communities defined by lineages. Other organizations outside of the government structures exist. These associations can include women’s groups, youth or ethnicity-based urban groups, providing support systems for rural-urban migrants. However, especially youth groups can also turn into militant organizations at times. Town politicians can mobilize rural constituencies around ethnicities of clan lines for support.¹⁴

Markets are poorly developed and most societies have been militarized so that distinctions between civilian and combatant young men are difficult. Literature mostly treats ‘civil society’ as organizations that are dependent on foreign resources and deploying foreign rhetoric of rights and development.¹⁵

After a general agreement in the 2005 Comprehensive Peace Agreement (CPA) that governance in South Sudan needs to be decentralized, the 2009 Local Government Act decentralized and devolved decision-making powers from the national level to the states, to county and sub-county (payam) levels and to bomas. County commissioners and county legislative councils are elected representatives. However, since 2011 many powers have been moved back to the central level in order to create a strong executive government model. Furthermore, the states also exercise a significant amount of power as they appoint state governors and control resources.¹⁶

¹³ Pendle et al, 2012, p. 15.

¹⁴ Pendle et al, 2012, p. 25

¹⁵ Pendle et al, 2012, p. 25.

¹⁶ Iffat Idris, Local governance in South Sudan: an overview, K4D Helpdesk Report, November 2017, p.2

Traditional authorities, in their various forms, have been integrated into local governance structures in order to improve service delivery, access to justice and eradicate poverty. The Local Governance Act deals with the distribution of powers between county, payam and traditional leaders. Chiefs can be elected conventionally or according to traditional practice. However, in addition to the fact that many traditional authorities historically had been appointed and empowered by outside sources, their power was further eroded during the recent civil war. Massive displacement of populations saw new chiefs emerging, factions of the conflict appointed their own chiefs, and existing traditional chiefs often had to side with the dominant political and militant groups in a given area.¹⁷

¹⁷ Iffat Idris, Local governance in South Sudan: an overview, K4D Helpdesk Report, November 2017, p.3

4.2. Stakeholder Analysis Matrix

Table 2: Stakeholder Analysis Matrix

Level		Stakeholder	Project Component	Analysis of the different groups of stakeholders
Project-Affected Parties				
National	MDAs	Ministry of Information and Communication Technologies and Postal Services (MICT&PS), National Communications Authority, Ministry of Roads and Bridges, Ministry of Transportation, Ministry of General Education and Instruction, Ministry of Trade and Industry, Ministry of Higher Education, Science and Technology	Component 1 Component 2 Component 3	MDAs are either directly or indirectly affected by the project, selected Ministries may be participating in the Project Steering Committee. MICT&PS will house the PIU and will be responsible for Project implementation
	Business Associations and Digital Businesses	South Sudan Chamber of Commerce and Agriculture	Component 3	Business Associations will be affected by the online market development and integration, and can benefit from the increase of the online market.
	Universities and Educational Centers	University of Juba	Component 2 Component 3	Universities and research institutions can be included in training and skills development, as well as any other research activities.
	Telecom and Insurance Providers	MTN, ZAIN, Digitel, UAP, Britam, Baping, Trinity Technology, Vobiss, Liquid Telecom	Component 1 Component 3	Telecom and insurance providers will be affected by the online market development, as well as the physical expansion of connectivity.
	Internet Service Providers	Liquid Intelligent Technologies, Muya, RCS – Radio and Satellite Communications Ltd., Eden	Component 1 Component 3	ISPs will be affected by the online market development, as well as the physical expansion of connectivity.

Level		Stakeholder	Project Component	Analysis of the different groups of stakeholders
	(ISP)	Technologies Ltd, IPTEC Limited, Horizon IT Solutions Ltd., DishNet Africa Ltd., Fast Network Ltd., Supernet Ltd., 4G Telecom Ltd., Pivotal System Ltd, Talia, Nile Fibertech Company Ltd., Tonlect Enterprise (SSND) Co Ltd., ATXNET Ltd.		
	Telecom Regulator and Implementing Authorities	Universal Service and Access Fund, South Sudan International Gateway, National Communication Authority (NCA)	Component 2	Telecom Regulator and Implementing Authorities will benefit from activities around cybersecurity frameworks and data exchange, governance and protection.
	Construction Companies		Component 1	Construction Companies have potentially an interest in obtaining contracts through the project
Local	County government	County governor and other county staff	Component 1	Under the Local Governance Act (LGA), responsibility for service delivery is devolved to the county/city level.
	Payam and Boma leadership	Payam/Boma Chiefs and Development Councils (where available)	Component 1	The LGA and its implementation guidelines prescribe the role and composition of <i>Boma</i> Development Committees (BDCs) and <i>Payam</i> Development Committees (PDCs) as semi-formal community institutions responsible for supporting the planning and implementation of local development initiatives.
	Municipal leadership	Members of city/town, block and quarter councils.	Component 1	They are important and need to be engaged in community meetings and consultations in municipal areas.
Community		Local leadership	Component 1	Need to be engaged in community consultation in regards to construction works required for the connectivity market development, especially on E&S matters of construction activities.
		Women and girls	Component 1	Women and girls in South Sudan suffer from significant discrimination, including in education, economic empowerment and public participation, and are subject to widespread GBV, including domestic violence, gang rape and

Level		Stakeholder	Project Component	Analysis of the different groups of stakeholders
				other abuses. Need to be engaged in community consultation in regards to construction works required for the connectivity market development, especially on E&S matters of construction activities (such as land rights).
		Vulnerable households	Component 1	There are a variety of vulnerable households, including female-headed households, households headed by persons with disabilities, and households headed by children. Such households are both less able to participate in engagement. Need to be engaged in community consultation in regards to construction works required for the connectivity market development, especially on E&S matters of construction activities.
		Widows	Component 1	The conflict in South Sudan had resulted in the deaths of thousands of people and has had a devastating effect on many families. Widows in particular are often marginalized and vulnerable in host communities as well as among the IDP and returnee populations. Need to be engaged in community consultation in regards to construction works required for the connectivity market development, especially on E&S matters of construction activities (e.g. in regards to land rights)
		Youth	Component 1	Youth is a big demographic in the country but given opportunities, they could contribute significantly to stability and economic prosperity. The Sudanese military as well as other armed groups have regularly recruited large numbers of boys as child soldiers and girls to perform sexual and domestic services for armed combatants. Need to be engaged in community consultation in regards to construction works required for the connectivity market development, especially on E&S matters of construction activities (e.g. in regards to labor)

Level		Stakeholder	Project Component	Analysis of the different groups of stakeholders
		Returnees / IDPs	Component 1	Due to the internal conflict in the country many people fled the country for security reason and will likely return as soon as stability and security is restored. Among returnees are persons who have suffered disabilities as a result of the conflict. Since IDP camps, in particular, should be integrated through data connectivity, returnees and IDPs need to be consulted.
		Refugees	Component 1	Since refugee camps, in particular, should be integrated through data connectivity, refugees need to be consulted.
		Ethnic minority groups	Component 1	Some of these groups have suffered historic discrimination and economic and political marginalization and also more recently, the brunt of the conflict. Need to be engaged in community consultation in regards to construction works required for the connectivity market development, especially on E&S matters of construction activities (e.g. in regards to land rights)
		People with Disabilities	Component 1	There are a significant number of persons with disabilities, including those injured during conflict. Need to be engaged in community consultation in regards to construction works required for the connectivity market development, especially on E&S matters of construction activities.
		General community members	Component 1	Demand for public awareness and services to members of community is high.
Interested Parties				
National	Donor Partners and Multilaterals	UNDP, UNESCO, UN Women, Gesellschaft für Internationale Zusammenarbeit (GIZ), Japan International Cooperation Agency (JICA), African Development Bank (ADB), South Sudan Internet Governance Forum	All Components	Donors and multilaterals may be important partners in the digitalization and should be kept informed.
	International	International NGOs operating in	All	International NGOs may be important partners in the

Level		Stakeholder	Project Component	Analysis of the different groups of stakeholders
	NGOs	the relevant sectors	Components	digitalization and should be kept informed.

4.3. Disadvantaged / Vulnerable Individuals and Groups

Table 3: Vulnerable Individuals and groups

Disadvantaged/ Vulnerable Group	Remarks
Women	<p>Women and girls are typically left out of decision-making processes and political representation, leading to local and community-based decisions that do not account for their unique needs and capacities. This produces a ripple effect on labor or economic opportunities, risks of GBV and educational opportunities.</p> <p>While the 2009 Land Act provides equal access and rights to land tenure for both men and women, customary justice outcomes indicate that women are consistently blocked from securing and owning property.¹⁸</p> <p>Women are targeted for sexual assault, either in military raids or by intimate partners. About 65% of women in South Sudan have been victims of physical and sexual violence. The risk of sexual violence negatively affects women’s ability to access income and resources.</p> <p>Women’s land rights are important to be considered regarding the construction activities planned under the project (digital connectivity and access roads); and women may be affected by labor influx.</p>
Girls	<p>Girls are often excluded from educational opportunities based on gender norms dictating girls’ domestic and caretaking responsibilities along with prospects for early marriage.</p> <p>Girls under 18 are also targeted as victims of sexual violence and UNICEF reports that the majority of women experience GBV for the first time when they are children.¹⁹</p> <p>The conflict has exacerbated the practice of bride price. Selling young girls for marriage is a coping strategy for families in times of economic hardship. Sexual abuse and early marriage also make them vulnerable to early pregnancy.</p> <p>Girls are also vulnerable to be traded for prostitution.</p> <p>Given potential labor influx under the construction activities on the project, attention needs to be paid to the protection of girls.</p>

¹⁸ Shelter NFI Cluster South Sudan (2017) “Key Housing, Land and Property (HLP) Issues in Urban Areas of South Sudan”.

¹⁹ UNICEF, 2018.

Disadvantaged/ Vulnerable Group	Remarks
Youth	<p>Years of conflict have provided distinct motivations for youth and their livelihood choices, including engagement in conflict and violence.²⁰ 30 per cent of young people between the ages of 15 and 35 identify themselves as currently ‘inactive’ – neither engaged in education nor economic activities.</p> <p>Young people have largely been excluded from political life, including through the age-based systems of authority that prevails in some parts of South Sudan. ‘Age sets’ are an important socio-cultural feature which denote formalized community groups in which members are of the same age.</p> <p>Youth can benefit significantly from data connectivity, but can also potentially be provided with jobs through planned construction activities.</p>
Minority Ethnic Groups	<p>The Project will potentially implement construction in areas that are both government and opposition-controlled, conflict-affected or have significant minority populations. Ethnic minorities may occur at different levels, in the state or even inside the county. Here they may be dominated by authorities from other groups and may have little decision-making power (see section above).</p>
Persons with Disabilities	<p>South Sudan has a National Disability and Inclusion Policy (2013). According to the last census in 2008/2009 there was a prevalence rate of disability in South Sudan of 5.1%. The disability assessment (2019) indicates that physical impairments represent between 35% and 52%, vision impairment between 20% and 33%, hearing impairment between 12% and 15% and intellectual and mental illness between 10% and 17%. The main challenges faced by people with disabilities are access to basic services and discrimination that hinders their participation in social, political and economic life.</p> <p>The projects needs to assure that PWD will be consulted accordingly in regards to E&S risks of the project.</p>
IDPs	<p>The conflicts in South Sudan have led to significant displacement of populations. Since 2013, over 1.9 million people (53.4 percent children) have been internally displaced in South Sudan. An additional 2.1 million have left the country as refugees.²¹ Almost 90 per cent of IDPs are women and children.</p>
Returnees	<p>IDPs and refugees are more likely to return to areas within or near their villages of origin. Given this pattern, most returnees are likely to be concentrated in rural and peri-urban areas where they remain vulnerable to shocks induced by climate volatility, administrative mismanagement and ongoing conflict due to increasing competition over resources, housing and access to basic services.</p> <p>Women on the move report that the most salient challenges they face are: SGBV, access to housing, land and property as well as extremely</p>

²⁰ Roz Price and Anna Orner, Youth in South Sudan: livelihoods and conflict, K4D, 2017, p.2.

²¹ UNICEF, Education, South Sudan Country Office, December 2019, p. 1.

Disadvantaged/ Vulnerable Group	Remarks
	scarce resources.
Refugees	Although South Sudan has more than 2.3 million refugees abroad and over 1.7 million IDPs, it also hosts some 320,000 refugees. The vast majority – roughly 95 percent – are Sudanese refugees living in the northernmost parts of South Sudan, in Jamjang County in the Ruweng Administrative Area and Maban County in Upper Nile State, while Pochalla in Pibor Administrative Area also hosts some. South Sudan also hosts refugees from DRC, CAR, Ethiopia, and Eritrea, primarily in Western Equatoria and Central Equatoria

4.4. Summary of Project Stakeholder Needs

Table 4: Project Stakeholder Needs

Level	Stakeholder Group	Key Characteristics	Language requirements	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings etc.)
National Level	MDAs	Potentially Influencing Party	English	Memo/letter, email, telephone calls, in-person meetings	Meetings on at least semi-annual basis, hand-outs.
	Business Associations and Digital Businesses	Interested Party	English	Memo/letter, website, email, telephone calls, in-person meetings	Meetings on at least semi-annual basis, hand-outs.
	Universities and Educational Centers and healthcare centers	Potentially Influencing Party	English	Email, website, telephone calls, in-person meetings	Face to face meetings on a regular basis.
	Telecom and Insurance Providers	Interested Party	English	Email, telephone calls, in-person meetings	Face to face meeting on a regular basis.
	Internet Service Providers (ISP)	Interested Party	English	Email communication	Face to face meeting on a regular basis.
	Telecom Regulator and Implementing Authorities	Potentially Influencing Party	English	Email, telephone calls, in-person meetings	Face to face meeting on a regular basis.
	Construction Companies	Interested Party	English	Website, emails	
	Donor Partners and Multilaterals	Interested Party	English	Website, emails, in-person meetings	
	International NGOs	Interested Party	English	Website, emails	
Local Level	County Government	Interested Party	English and locally applicable languages	Email, telephone calls Face-to-face meetings, radio	Need for close coordination and information sharing for smooth implementation.
	Payam and Boma	Interested	English and	Email, telephone calls	Very important body - link between the

Level	Stakeholder Group	Key Characteristics	Language requirements	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings etc.)
	leadership	Party	locally applicable languages	Face-to-face meetings, radio	community, the county and development partners. Contact should be initiated on a regular basis during implementation
	Municipal leadership	Interested Party	English and locally applicable languages	Email, telephone calls Face-to-face meetings, radio	Very important body - link between the community, the county and development partners. Contact should be initiated on a regular basis during implementation
	Local leadership	Interested Party	Locally applicable languages	Email, telephone calls Face-to-face meetings, radio	Regular contact
	Women and girls	Vulnerable Group	Locally applicable languages	Face-to-face meetings at community level, notice boards, radio	May be illiterate, methods must cater for that. Child care needs
	Vulnerable Households	Vulnerable Group	Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	Cannot afford services at high cost and may be illiterate
	Youth	Vulnerable Group	Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	Need to be empowered and should therefore be well as being integrated into consultations
	IDPs and Returnees	Vulnerable Group	Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	May find that their place of origin or home is occupied by other people
	Ethnic minority groups	Vulnerable Group	English and locally applicable languages – in particular language of the minority group	Notice board, Face-to-face meetings at community level, radio	Feel marginalized and mechanisms need to be in place to empower and involve them in productive endeavours
	Persons with disabilities	Vulnerable Group	Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	May require different engagement methods to cater for disability and allow information to reach them
	General community	Potential	Locally	Notice board, Face-to-face meetings at	Need to have clear information dissemination

Level	Stakeholder Group	Key Characteristics	Language requirements	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings etc.)
	members	y Influencing Party	applicable languages	community level, radio	in order to be inclusive

5. Stakeholder Engagement Program

5.1. Purpose and Timing of Stakeholder Engagement Program

Project preparation has relied significantly on stakeholder engagement in order to gain a granular understanding of needs and priorities at each level and assess any potential environmental and social risks the project may have.

The objectives of information dissemination and consultations and under the EA-RDIP are: (a) understanding of the digital of the citizens of South Sudan; (b) reception of feedback and comments as well as grievances from all stakeholders on project design and implementation; (c) feedback on potential environmental and social risks and impacts and mitigation measures in relation to construction activities; (c) provision of regular information to stakeholders related to project implementation progress and any other emerging issues throughout the project cycle; (d) provision of transparent and accountable mechanisms on all aspects of the project and subproject design and implementation; and (e) provide constant engagement with community leaders and other stakeholders in construction areas to ensure information flow and timely response to security risks and mitigation measures.

To ensure this, a grievance redress mechanism (GRM) will be set up and implemented throughout the life cycle of the project (see below). It is designed to allow all affected individuals and groups to report on project-related grievances or to provide comments and feedback. In addition, the ESCP and ESMF will be publicly disclosed at the county level in selected counties to ensure that everyone is informed about social and environmental risks and respective mitigation measures. For this purpose, a non-technical summary will be prepared in the local languages.

5.2. Proposed Strategy for Information Disclosure

Information disclosure to all potential stakeholders will rely on the following key methods: website, radio broadcasting, community meetings in coordination with local authorities (county governments, boma and payam leadership), phone communication (SMS), and notices at the payam and boma level. Information will be disclosed in English or the respective local language, where appropriate. Local authorities, such as traditional authorities, religious leaders, and county governors will be requested to inform communities in community meetings and through disclosure at project locations.

Table 5: Strategy for Information Disclosure

Project Stage	Information to be disclosed	Methods proposed	Timetable: locations / dates	Targeted stakeholders	Estimated disclosure targets	Responsibilities
Project Design	SEP (including GRM)	<p><u>National and county level:</u> Website, emails, radio, telephone calls</p> <p><u>Community level:</u> Community meetings, community boards, radio</p>	Prior to disbursement	<p><u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership</p> <p><u>Community level:</u> Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community</p>	20% of all stakeholders	MICT/P&S
	ESCP	<p><u>National and county level:</u> Website</p> <p><u>Community level:</u> community boards</p>	Prior to disbursement	<p><u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership</p> <p><u>Community level:</u> Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community</p>	70% of stakeholders	MICT/P&S
	ESMF	<p><u>National and county level:</u> Website, emails, radio, telephone calls</p> <p><u>Community level:</u></p>	Prior to disbursement	<p><u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership</p> <p><u>Community level:</u> Local leadership; Women and girls;</p>	70% of stakeholders	MICT/P&S

Project Stage	Information to be disclosed	Methods proposed	Timetable: locations / dates	Targeted stakeholders	Estimated disclosure targets	Responsibilities
		Community meetings, community boards, radio		Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community		
	Workers' GRM	Worker meetings and workers' contracts	Prior to engaging project workers	All project workers	70% of workers	MICT/P&S
	GBV/SEAH Action Plan	<u>National and county level:</u> Website, emails, radio, telephone calls <u>Community level:</u> Community meetings, community boards, radio	Prior to disbursement	<u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership <u>Community level:</u> Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community	70% of stakeholders	MICT/P&S
Project Implementation	ESMPs/RAPs, etc... for subprojects	<u>Community and county level:</u> Community meetings, community boards, radio	Prior to construction works commencing	County Government; Payam and Boma leadership; Municipal leadership, Community members (including all vulnerable groups), local governments, CSOs and NGOs, business community, county coordination committee	20% of stakeholders	MICT/P&S
	Project Reports	<u>National and county level:</u> Website, emails, radio, telephone calls <u>Community level:</u>	When available	<u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership <u>Community level:</u> Local leadership; Women and girls;	20% of stakeholders	MICT/P&S

Project Stage	Information to be disclosed	Methods proposed	Timetable: locations / dates	Targeted stakeholders	Estimated disclosure targets	Responsibilities
		Community meetings, community boards, radio		Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community		
	SEP (including GRM and security issues)	<u>National and county level:</u> Website, emails, radio, telephone calls <u>Community level:</u> Community meetings, community boards, radio	Throughout implementation	<u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership <u>Community level:</u> Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community	20% of all stakeholders	MICT/P&S

5.3. Proposed Strategy for Consultation

This plan lays out the overall consultative processes of the project with its different stakeholders. The GRM will be another means of consultation, as complaints received will be filed, assessed and responded to (see below).

Table 6 Strategy for Consultation

Project Stage	Topic of Consultation	Suggested Method	Timetable: location and dates	Target stakeholders	Expected Outcome	Responsibilities
Project Design	Overall project activities	Project Steering Committee, GRM, face to face meetings, community meetings	Juba	<p><u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership</p> <p><u>Community level:</u> Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community</p>	Understanding of the overall project activities	MICT/P&S
	SEP (including GRM)	GRM, face to face meetings, community meetings	Juba / County / Payam	<p><u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership</p> <p><u>Community level:</u> Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community</p>	<p>Reception of feedback and comments as well as grievances from all stakeholders on project design, as well as potential environmental and social risks and impacts and mitigation measures</p> <p>Provision of transparent and accountable mechanisms on all aspects of the project and design</p>	MICT/P&S
	ESCP	Inter-ministerial Steering Committee, GRM, email	Juba	<p><u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and</p>	Provision of transparent and accountable mechanisms on all aspects of the project and design	MICT/P&S

Project Stage	Topic of Consultation	Suggested Method	Timetable: location and dates	Target stakeholders	Expected Outcome	Responsibilities
				Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership		
	ESMF	Project Steering Committee, GRM, face to face meetings, community meetings	Juba	<u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership	Reception of feedback and comments as well as grievances from all stakeholders on project design, as well as potential environmental and social risks and impacts and mitigation measures	MICT/P&S
Project launch / Entry	Introduction of the project	Stakeholder meeting / conference	Juba /	<u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership	Understanding of the project activities and objectives	MICT/P&S
Project Implementation	ESMPs / RAPs	Community meetings, notice boards at county, payam and boma level	County / Boma / Payam	<u>Community and county level:</u> county authorities; local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community	Understanding of planned works and feedback on particular E&S risks and impacts	MICT/P&S
	Project Implementation as a whole, including security parameters for project-affected persons	Radio, community meetings, notice boards at county, payam and boma level	Juba/State/ County	<u>Community and county level:</u> county authorities; local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community	Provide regular information and feedback to stakeholders related to project implementation progress and any other emerging issues	MICT/P&S

Project Stage	Topic of Consultation	Suggested Method	Timetable: location and dates	Target stakeholders	Expected Outcome	Responsibilities
	M&E	Stakeholder meetings, community meetings, notice boards at county, payam and boma level	Juba/State/ County	<p><u>National and county level</u>: Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Payam and Boma leadership; Municipal leadership</p> <p><u>Community level</u>: Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community</p>	<p>Reception of feedback and comments as well as grievances from all stakeholders on project design, implementation as well as potential environmental and social risks and impacts and mitigation measures</p> <p>Regular information and feedback to stakeholders related to project implementation progress and any other emerging issues</p>	MICT/P&S

5.4. Proposed Strategy to Incorporate the View of Vulnerable Groups

The PIU will ensure that women and other vulnerable groups are participating in consultative processes and that their voices are not ignored. This may require specific meetings with some of the above identified vulnerable groups at the community level, in addition to general community consultations. For example, women may be more outspoken in women-only consultation meetings than in general community meetings. Similarly, separate meetings will be held with young people or with ethnic minority groups for each subproject or activity.

In view of promoting gender equality, it is most important to engage women's groups on an ongoing basis throughout the lifetime of the project. Women voicing their concerns and contributing in the decision-making process on issues such as local level public works should be encouraged, especially in governmental or traditional committees predominantly consisting of men.

All implementing partners and contractors are similarly encouraged to deploy female staff, in particular where staff interface with community members.

GRMs are designed in a way that all groups identified as vulnerable (see below) have access to the information and can submit their grievances and receive feedback as prescribed.

5.5. Timelines

The project is planned for a duration of 54 months. Information disclosure and consultations are especially relevant throughout the early stages of the project, but also throughout the project cycle. Project design has therefore been based on consultations. Activities under each sub-component will include further consultations prior to their commencement to ensure transparency and accountability on project modalities, and to allow community voices to form the basis of the concrete design of every intervention and consultations will continue throughout the project cycle.

5.6. Reviews of Comments

The PIU will compile all comments and inputs originating from the different consultation methods to ensure that the project has general information on the perception of stakeholders and their concerns, and for the Project to remain on target. It will be the responsibility of all implementers to respond to comments and inputs, and to keep open a feedback line to the communities, as well as the local authorities.

Training on environmental and social standards facilitated by WB will be provided soon after the project becomes effective to ensure that all implementing staff are equipped with the necessary skills.

5.7. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

Budgetary resources will be dedicated to the implementation of the SEP.

Table 7 Indicative Budget for implementation of SEP

Stakeholder Engagement Activity	Total Cost (USD)
Social experts	
Dedicated social safeguards specialist at PIU (30 % of time for the implementation of the SEP, for 2 years)	40,000
Consultation and disclosure	
Consultation sessions in all the works-affected communities	300,000
Establishment and maintenance of website	100,000
Radio broadcasts	100,000
Other disclosure campaigns	100,000
Grievance redress mechanism	
GRM Hotline	10,000
Dissemination of information on GRM	20,000
Monitoring and documentation of SEP implementation	
Verification of SEP activities (field visits, etc.)	Included in PIU travel budget
TOTAL	670,000

5.8. Management Functions and Responsibilities

The stakeholder engagement activities fulfill part of the commitments laid out in the Environmental and Social Commitment Plan (ESCP). The ESCP is part of the legal agreement between the Bank and the borrower, which ensures project management is committed to the planned activities. It is part of the project approval documents and will guide the Bank in monitoring project progress. The Monitoring & Evaluation (M&E) Plan of the project contains indicators to help track progress of the ESCP implementation. A progress report will be periodically produced and shared with stakeholders for review, deliberation and action.

The PIU Project Manager has the overall responsibility for the implementation of the SEP. The PIU Social Specialist will oversee the implementation of the SEP on a day-to-day basis. The Specialist will maintain a stakeholder database for the overall project and will lead a commitment register. The PIU will oversee all coordination and disclosure-related consultations. Implementing partners, for example those working at the local level, will implement the SEP at the community level in their respective project sites and will report on their activities to the PIU Social Specialist on a monthly basis. The PIU will undertake field verification activities— at least every other month, or during planned events.

6. Grievance Redress Mechanisms

Under the World Bank ESSs²², Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.²³ One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances’.²⁴ This Project GRM should facilitate the project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The Project will provide mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the EA-RDIP.

As per World Bank standards, the GRM will be operated in addition to a separate GBV/SEA/SH Action Plan, which includes reporting and referral guidelines. However, the Project GRM will also handle GBV/SEA/SH cases where necessary. Additionally, in line with the provisions of ESS2, a grievance mechanism will be provided to all direct workers and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. This worker grievance mechanism is included in the project’s Labor Management Procedures (LMP) (see ESMF). Given the small-scale nature of works and focus on locally sourced labor, the intake mechanisms of the overall GRM will also allow intake of grievances under ESS2. Note that for SH at the workplace, provisions under the GBV/SEA Action Plan apply.

The GRM aims to address concerns effectively and in a timely and transparent manner. It is readily accessible for all project-affected parties and does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all the needs and concerns of project-affected parties.

6.1. GRM Core Principles

The GRM is based on six core principles:

Fairness: Grievances are treated confidentially, assessed impartially, and handled transparently.

²² World Bank, Environmental and Social Framework, 2018.

²³ Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which is laid out in the Labour Management Plan (LMP). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV grievance redress mechanisms, which is laid out in a separate GBV/SEA and Child Protection Risks Action Plan.

²⁴ World Bank, 2018, p. 131.

Objectiveness and independence: The GRM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment in each case. GRM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).

Simplicity and accessibility: Procedures to file grievances and seek action are simple enough that stakeholders can easily understand them. Project stakeholders have a range of contact options including, at a minimum, a telephone number. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, and their level of education or income. The GRM does not use complex processes that create confusion or anxiety.

Responsiveness and efficiency: The GRM is designed to be responsive to the needs of all complainants. Accordingly, staff handling grievances are trained to take effective action, and respond quickly to grievances and suggestions.

Speed and proportionality: All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken is swift, decisive, and constructive.

Participation and social inclusion: A wide range of stakeholders are encouraged to bring grievances and comments to the attention of the Project staff. Special attention is given to ensure that marginalized or vulnerable groups, including those with special needs, are able to access the GRM.

6.2. GRM Value Chain

Step 1: Grievance Uptake: Multiple channels must be available for stakeholders to file their complaint, grievance, or feedback. The stakeholder must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

Means of Filing a Grievance

There are four distinct means, at least two of which must be made available at the sub-project locality for people to file a grievance (see complaints form and grievance register, Annex 1 and 2):

1. A phone number for a hotline operator: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator should be available from 8.00 am to 5.00 pm every day. The hotline operator is set up and managed by the PIU. Any concerned party can call the hotline number and file a grievance with the Project.

2. A help desk will be set up during the implementation of sub-project activities in a specific locality, especially where construction activities are undertaken. It should be manned by the implementing staff, in close coordination with local authorities. At the help desk, stakeholders can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk.
3. Relevant assigned personnel available in each project site will be required to accept grievances and ensure that avenues for lodging grievances are accessible to the public. The first point of contact for all potential grievances from community members may be the contractor or a local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance.
4. A suggestion box will be installed at the nearest Boma or Payam office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the suggestion box must be expressed in writing.

Incident reporting

Severe incidents (defined as an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, for example: serious injuries, fatality, GBV, forced or child labor, damage on Project infrastructure, as well as organized large scale robbery, looting etc, abuse and cases of mistreatment of communities and/ or workers by security forces (including GBV/SEA/SH, spread of communicable diseases among workforce, kidnapping, etc...) will be reported within 48 hours to the PIU and onwards to the World Bank.

At all times, the PIU will provide feedback promptly to the aggrieved party, for example through the phone. Feedback is also communicated through stakeholder meetings and beneficiary meetings during project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Records of all feedback and grievances reported will be established by the PIU. All feedback is documented and categorized for reporting and/ or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible, should include the name of the person providing feedback as well as the boma, payam and county, (where applicable), the project activity and the nature of feedback or complaint.

Step 2: Sort and Process: All registered grievances will be transferred to the PIU GRM Officer – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM Officer will categorize the complaint. Worker-related grievances will be handed over to a workers' GRM. Where grievances are of sexual nature, the focal point has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the SEA/SH Action

Plan. Dedicated training on how to respond to and manage complaints related to Sea/SH will be required for all GRM operators and relevant project staff.

Where grievances can be handled locally, the GRM Officer will return these grievances to the appropriate local structures to be handled by existing dispute settlement mechanisms. However, these can only be involved if the GRM Officer assesses that the complainant is not a member of a vulnerable group or minority that would not be catered for by the local mechanism in an equal manner.

For grievances handled under the general Project GRM, the GRM Officer will determine the most competent and effective level for redress and the most effective grievance redress approach. The Officer will further assign timelines for follow-up steps based on the priority of the grievance, and make a judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g. at the court). The GRM Offer should offer the complainant option/s for resolution of their grievance.

The GRM Officer will also transfer the grievance information into a more comprehensive grievance register.

Step 3: Acknowledgement and Follow-Up: The PIU will decide whether a grievance can be solved locally, with local authorities, contractors, or NGOs, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Officer the appropriate individuals that could be addressed with the case, if the case can be solved at the local level. At all times, the GRM Officer will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Step 4: Verify, Investigate and Act: The GRM Officer will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redressing action and plan.

Verification: Check for eligibility (objectively based on set standards and criteria) of the complaint in terms of relevance to the project; escalate outright grievances that require high level interventions; refer outright grievances that are outside the project jurisdiction (e.g. refer to PIU Project Manager or relevant external institution)

Once eligibility is determined, the GRM Officer will categorize the complaint into defined categories:

Investigation:

- GRM Officer to appoint an independent investigator (E&S Specialists, professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)
- Collect and preserve evidence
- Analyze to establish facts and compile a report

Grievance Action Plan

- Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction
- undertake mutually agreed follow-actions
- Update of complainant
- Provide complainant with a grievance redress status update and outcome at each stage of redress, (iii) update the IP or PIU on grievance redress across the GRM value chain.

Step 5: Monitor, Evaluate and Provide Feedback: The GRM Officer will provide feedback to GRM users and the public at large about: results of investigations; actions taken; why GRM is important; enhance the visibility of the GRM among beneficiaries; and increase in users' trust in the GRM.

The PIU will undertake the following monitoring actions: develop indicators for monitoring the steps of GRM value chain; track grievances and assess the extent to which progress is being made to resolve them; conduct a stakeholder satisfaction survey for the GRM services; conduct analysis of the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact; provide a report on grievance redress actions pertaining to the steps of GRM value chain.

The PIU will evaluate the GRM by: analyzing grievance data to reveal trends and patterns; sharing GRM analysis in management meetings; and taking corrective action on project implementation approaches to address the grievance.

SEA/SH-related Grievances

Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on SEA/SH-related grievances. No grievance uptake mechanism can reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of SEA/SH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centered approach from mandatory reporting.

The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor’s informed consent – report the case to one of the Project’s formal GRM. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

The grievance recipient will be responsible for the recording and registration of the complaint. A GRM operator cannot reject a SEA/SH complaint. At the same time, however, the project can only respond to a SEA/SH complaint if it is directed into the designated GRM channels.

Confidentiality: All grievance recipients and anyone handling the SEA/SH-related grievances must maintain absolute confidentiality in regard to the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. There are exceptions under distinct circumstances, for example a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others, in which case referrals to lifesaving services should be sought; b) if the survivor is a child and there are concerns for the child’s health and safety. The survivors need to be informed about these exceptions.

Informed Consent: The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up. Asking for consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or IPs or PIU), and/or to undertake any action (for instance investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on. In the case of children, informed consent is normally requested from a parent or legal guardian and the children.

6.3. WB’s Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB’s independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank’s attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects->

[operations/products-and-services/grievance-redress-service](#). For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

7. Monitoring and Reporting

7.1. Involvement of Stakeholders in Monitoring Activities

Adequate institutional arrangements, systems and resources will be put in place to monitor the implementation of the SEP. The main monitoring responsibilities will be with the PIU. This will be led by the PIU Social Specialist. The PMU Project Manager will be overall responsible for the implementation of the environmental and social mitigation measures, including the SEP, as well as for monitoring and inspections for compliance with the SEP.

The Project's M&E Plan will include monitoring indicators for the measurement of the performance of the SEP.

The PMU will collect all reporting, as well as its own findings, and produce an overall environmental and social progress report, which will contain a distinct section of stakeholder engagement and which will be provided to the World Bank. The project will follow a quarterly reporting cycle. These quarterly reports will further be shared with all stakeholders, as defined in the SEP.

7.2. Reporting Back to Stakeholder Groups

Results of stakeholder engagements will be regularly reported back to the stakeholders. It will be the responsibility of the PIU to ensure that all relevant reporting is shared through the above defined public means.

Annex 1: Consultations Undertaken for EA-RDIP

The below stakeholders were consulted during the World Bank mission to South Sudan from 21-25 February 2022.

Table 8 Stakeholders consulted during mission in February 2022

DE4A Technical Committee

	Name	Affiliation
1	Dr. Lado Wani Kenyi, Undersecretary	MICT&PS
2	Napoleon Adok, Director General	NCA
3	Papiti Okwaci, CEO	South Sudan International Gateway (SSIG)
4	Thomas Gatkuoth, Director General of Telecommunications	MICT&PS
5	Branya Jibi, Director of IT	MICT&PS
6	Chol Mayen, Director of Technical Services	NCA

Key Stakeholders Consulted

S No.	Session	Affiliation/Entity Represented
1	DE4A Kick-off/ Orientation	DE4A Committee – Government of the Republic of South Sudan (GRSS) including MICT&PS, NCA, SSIG
2	Understanding ICT structure, priorities, and plans	DE4A Committee – Government of the Republic of South Sudan (GRSS) including MICT&PS, NCA, SSIG
3	Regional integration; Horn of Africa Initiative	DE4A Committee – Government of the Republic of South Sudan (GRSS) including MICT&PS, NCA, SSIG
4	Donor Partners and Multilateral efforts	<ol style="list-style-type: none"> 1. United Nations Development Programme (UNDP) 2. UNESCO 3. UN Women 4. GIZ 5. JICA 6. South Sudan Internet Governance Forum 7. African Development Bank
5	South Sudanese Business Associations/Ministries/Authorities	<ol style="list-style-type: none"> 1. South Sudan Chamber of Commerce, Industry, and Agriculture 2. Ministry of Trade and Industry
6	Universities and Educational Centres	<ol style="list-style-type: none"> 1. University of Juba 2. Kampala University
7	Telecom Providers	<ol style="list-style-type: none"> 1. MTN 2. ZAIN 3. Digitel
8	Insurance Providers	<ol style="list-style-type: none"> 1. UAP 2. Britam 3. Baping
9	Accelerators, Incubators, start-ups, early-stage tech businesses, and digital training providers	<ol style="list-style-type: none"> 1. Dynamic Consult 2. Komax Consult 3. Komakech Denis Don 4. Koneta Hub 5. JICTS 6. Foundation for Youth Initiative (FYI)

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		5. ATXNET Ltd
25	Foreign Exchange, taxation and accounts	<ol style="list-style-type: none"> 1. Bank of South Sudan 2. National Revenue Authority

10	Public Commercial Banks	1. Alpha Bank 2. Cooperative Bank South Sudan
11	ISP	1. Liquid Intelligent Technologies 2. Muya 3. RCS – Radio & Satellite Communication Limited 4. Eden Technologies Ltd 5. IPTEC Limited
12	Digital Public Platforms	1. Ministry of Public Service and HRD 2. Ministry of Labour
13	Private Commercial Bank	1. Kush Bank 2. Ecobank South Sudan 3. Kenya Commercial Bank
14	ISP	1. Horizon IT Solutions Limited 2. DishNet Africa Limited 3. Fast Network Limited 4. Supernet Limited 5. 4G Telecom Limited
15	Education Sector overview	1. Ministry of General Education and Instruction
16	Fintech Players and Digital Businesses	1. Trinity Technologies 2. Linkspay 3. South Sudan Women Finance 4. Vision Capital
17	Telecomm Regulator and Implementing Authorities	1. National Community Authority (NCA) 2. Universal Service and Access Fund (USAF) 3. South Sudan International Gateway (SSIGW)
18	Digital Businesses	1. Agoro 2. Sosuda Tech 3. Nileboda
19	E-service platforms	1. Crawford Capital Limited 2. Ministry of Interior
20	ISP	1. Smart Network Limited 2. Deltanet Co Ltd (Deltanet Fiber) 3. ATX Net 4. Voda Network System Limited
21	Education Sector	1. Ministry of Higher Education, Science, and Technology 2. University of Juba
22	Gender Priorities in ICT	1. Ministry of Gender, Social Welfare, and Religious Affairs 2. GoGirls ICT Initiative 3. UN Women 4. South Sudan Women's Entrepreneurs' Association 5. South Sudan Women Finance
23	Cyber Security	1. NCA 2. MICT&PS
24	ISP	1. Pivotal System Ltd 2. Talia 3. Nile Fibertech Company Limited 4. Tonlect Enterprise (SSND) Co Ltd

Table 9 List of stakeholders engaged in regional validation workshop 26-30 September 2022

No.	NAME	POSITION
East African Community (EAC)		
1.	Mr. Obura Carolos E. Assai	Deputy Director for Entrepreneurship, Ministry of Trade and Industry, The Republic of South Sudan
2.	Dr. Fred Simiyu	Ag. Director, Research and Trade Policy Analysis, State Department of Trade and Enterprise Development, Ministry of Industrialization, Trade and Enterprise Development, The Republic of Kenya
3.	Mr. Leonidas Ndayahundwa	Head of Legal and Consumer Protection Affairs, Telecommunications Regulatory and Control Agency, The Republic of Burundi
4.	Mr. Sosthene Bwigenge	Smart Cities and Communities Outreach Specialist, Ministry of ICT and Innovation, The Republic of Rwanda
5.	Mr. Samuel Walusimbi	Systems Administrator, Ministry of East African Community Affairs, the Republic of Uganda
6.	Eng. Peter Mwasalyanda	Assistant Director for ICT Systems and Service Development, Ministry of Information, Communications and Information Technology, the United Republic of Tanzania
7.	Pantaleo Kessy	Principal Physical Policy EAC
8.	Gabriel Kinu	ICT Expert Customs EAC
9.	James Kivuva	Senior Meteorologist EAC
10.	Aileen Mallya	Webmaster EAC
11.	Alexis Songorwa	Senior Accountant EAC
12.	Damaris W Nyaga	Resource Mobilization Officer
13.	Aime Vwase	Acting Director Planning EAC
14.	Maria Sembua	IT Officer Trade Uganda
15.	Sarah Kabaluna	Communication Expert EAC
16.	Irene Charles Isaka	Director Social Sector EAC
17.	Pascal Mbayahaca	ICT Central Bank Burundi
18.	Edna Mbase	ICT EALA Legislative Assembly
19.	Jean Paul	Chief Digital Officer Ministry of Trade Uganda
20.	Ngezi K	Chief Digital Officer
21.	Faith Didas Matoli	Ministry of Information Communication and IT
22.	Jean Bosco Ndikumana	Board Advisor in charge of Payment Systems

23.	Alice Zanza	Senior Financial Sector Specialist
24.	Zaid Mkangwa	East African Health Research Commission
25.	Opiyo Andrew Nyawango	Director of ICT
26.	Daniel Murenzi	Chief Principal Information Technology Officer - EAC
World Bank		
27.	David Satola	Lead Counsel
28.	Tim Kelly	Lead Digital Development Specialist
29.	Cecilia Paradi-Guilford	Senior Digital Development Specialist
30.	Martin Molinuevo	Senior Private Sector Specialist
31.	Victor Kyalo	Senior Digital Development Specialist
32.	Anat Lewin	Senior Digital Development Specialist
33.	Rory Macmillan	Consultant; Partner, Macmillan Keck, Attorneys & Solicitors
34.	Evalyn Anyango Oloo	Digital Development Consultant
35.	Lamia Naji	Digital Development Consultant

The following stakeholders were consulted during the World Bank mission to Addis Ababa and South Sudan from 30 August – 30 September 2022.

Table 10 Officials met during Mission

S/ N o.	NAME	POSITION, ORGANIZATION
1	Hon. Dr. Jacob Maiju Korok	Deputy Minister, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
2	Dr. Lado Wani Kenyi	Undersecretary, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
3	Mr. Thomas Gatkuoth Nyak	Director General of Telecom, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
4	Mr. Peter Ajang Nyibong	Director General of Planning, MOFP
5	Mr. Papiti Okwaci Nyilek Ajak	CEO, South Sudan International Gateway (SSIGW)
6	Mr. Chol Joseph Mayen Dut	Director of Technical Services, National Communication Authority (NCA)
7	Mr. Henry Owera Bakata	Deputy Director of Policy, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
8	Mr. Gabriel Gong Baak Madut	Assistant Director of Aid Coordination, Ministry of Finance and Planning (MoFP)
9	Ms. Alma Gabriel Korsuk	Ministry of Higher Education, Science and Technology (MoHEST)
10	Mr. Kennedy Alfred Remo Musa	Commissioner of ICT, National Revenue Authority (NRA)
11	Mr. Kenyi Alex Simon Monokoteng	Director of Accounts, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
12	Mr. Tereka Moses Lumori	Senior Inspector of Procurement, Ministry of Information, Communication Technology and Postal Services (MICT&PS)

Annex 2: GRM Form

Reference No: _____

Details of Complainant:

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent

Full name: _____

- I wish to raise my grievance anonymously
 I request not to disclose my identity without my consent

Contact

By Mail: Please provide mailing address:

Gender of Complainant:

Age of Complainant:

Contact Information

Please tick how you wish to be contacted: - E-mail, Telephone, in Person

By Telephone: _____

By E-mail _____

One time incident/grievance Date ____/____/____

Happened more than once (how many times) _____

On-going (currently experiencing problem)

Description of Incident or Grievance:

Location of grievance:

What happened? Where did it happen? Who did it happen to? What is the result of the problem?

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

Annex 3: Grievance Register

The grievance register will contain the following information (ideally in an excel file, or if at local level in a book) :

Table 11 Grievance Register

Type of Information	Response
Complaint/ Log number	
Reference document (s)	
Date complaint made	
Date complaint received	
Category of Grievance	
Method of Logging: Direct Communication; Suggestion Box; Toll-free Line;	
Complaint name (state if anonymous)	
Location in which complained action took place (district, village)	
Caller contacts for follow up	
Gender	
Age	
Parties against whom complaint is made (unit/contractor/agency etc)	
Nature of Complaint ["SEA/GBV"; "Timing of Payment"; "Amount of Payment"; "Inclusion or Issue regarding Project benefits" or create standard categories based on complaint type]	
Description of Complaint	
Nature of feedback (describe)[In case issue type is GBV/SEA immediate referral to the GBV referral system]	
Verification and investigation (describe)	
Recommended action (describe)	
Timeline of Initial feedback (within 5 days) [investigate the claim within 5 working days, and share findings/feedback with relevant stakeholder]	
Status update (and justification if it is not expected to be resolved within the timeframe set out)	
Date resolved	
Indicate if a spot check has been conducted (you can include then in the narrative reports spot checks for resolutions of x number of complaints have been conducted)	

Annex 4: GBV/SEA Case Registration Form

Table 12 GBV/SEA Case Registration Form

GBV/SEA/SH Case Registration Form	
Administrative Information	
	Grievance ID
	Code of Survivor (Employ a coding system to ensure that client names are not easily connected with case information)
	Date of grievance registration
	Date of Incident
	Reported by survivor or an escort of the survivor, in the presence of the survivor
	Reported by someone other than the survivor without survivor present
Survivor Information	
	Gender / age
	Location / Residence
	Current civil/marital status
	Occupation
	Is the survivor a person with mental or physical disabilities?
	Is the survivor an unaccompanied or separated child?
	Was the perpetrator related to the project?
	Has Informed Consent been provided? yes/no?
	Has the case been reported elsewhere (including police / lawyer/health services/psychosocial counseling, other)?
Sub-Section for Child Survivor	
	If the survivor is a child (less than 18 years), does he or she live alone?
	If the survivor lives with someone, what is the relation between her/him and the caretaker? (parent/guardian; relative; spouse; other)
	What is the caretaker's current marital status?
Details of the Incident (in survivor's words)	
	Details of the incident
	Incident location and time
	Were money, goods, benefits and/or services exchanged in relation to the incident?
Alleged Perpetrator Information	
	Number of alleged perpetrators
	Sex of alleged perpetrators
	Age group of alleged perpetrator(s)
	Indicate relationship between perpetrator(s) and survivor

	Main occupation of the alleged perpetrator(s)	
	Employer of the alleged perpetrator(s)	
Planned Actions / Actions Taken		
	Was the survivor referred by anyone?	
	Was the survivor referred to a safe house / shelter?	
	Which services does the survivor wish to be referred to? <ul style="list-style-type: none"> - Psychosocial services - Legal services - Police - Health services - Livelihood program 	
	What actions were taken to ensure the survivor's safety?	
	Describe the emotional state of the client at the beginning of the report	
	Other relevant information	