Government of Lesotho

MINISTRY OF FINANCE AND DEVELOPMENT PLANNING (MFDP)

LESOTHO PUBLIC SECTOR FOUNDATIONS FOR SERVICE DELIVERY PROJECT (LPSFSD).
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STAKEHOLDER ENGAGEMENT PLAN (SEP)

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Prepared for: | **Ministry of Finance and Development Planning.**
Maseru
Lesotho

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Prepared by:-   Sibekile Mtetwa
Environmental and Social Specialist
Molula Street
Ha Thetsane
P. O. Box 2371
Maseru 100
Lesotho
mikemtetwa@live.com

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1. Introduction

This Stakeholder Engagement Plan (SEP) contains information about the stakeholder engagement activities that the Ministry of Finance and Development Planning (MFDP) expects to implement for the Lesotho Public Sector Foundations for Service Delivery Project (LPSFSD).

This instrument was prepared under the provisions of the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies need to provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

The following sections provide additional details on the planned stakeholder engagement activities during the project cycle, to promote inclusive and meaningful stakeholder participation.

Project Description

The Lesotho Public Sector Foundations for Service Delivery Project (LPSFSDP) aims to strengthen expenditure controls and increase the efficiency of selected administrative services.

The Lesotho Public Sector Foundations for Service Delivery Project (LPSFSDP) comprises the following components:
   a) Expenditure management strengthening.
   b) Human resources management and organizational transformation.
   c) Shared digital government foundations.
   d) Reform coordination and project management support

The specific components and sub-components of the project are listed below:

Table 1-1   Proposed project Components and Sub-Components

1.0	**Component 1: Expenditure management strengthening.**	*Sub-Component 1.1. Budget System Coverage.*
		Sub-Component 1.2. Public Investment Effectiveness.
		Sub-Component 1.3. Asset Management Development.
		Sub-component 1.4. Public Procurement Modernization.
2.0	**Component 2: Human Resource Management and Organizational Transformation.**	*Sub-component 2.1. HRMIS enhancements.*
		Sub-Component 2.2. Functional and regulatory reform.
		Sub-component 2.3. Capacity development and change management.
3.0	**Component 3. Shared digital government foundations.**	*Sub-Component 3.1. Enabling Environment.*
		Sub-Component 3.2 Digital Platforms and Solutions.
		Sub-component 3.3. Change Management.

4.0	**Component 4:** **Reform coordination and project management support.**	*Component 4.* *Reform Coordination and Project Management Support.*
5.0	**Component 5:** **Contingent Emergency Response Component.**	*Component 5.* *Contingent Emergency Response Component.*

2. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

3. Stakeholder identification and analysis

3.1 Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- *Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

3.2. Affected parties and other interested parties [1]

Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Government Ministries at District level
- Environmental Officers at District Level
- PIT staff
- MAFS staff at District Level
- MoSD staff at District Level
- Other collaborating institutions.

The projects' stakeholders also include parties other than the directly affected stakeholders, including
- Key Ministries:
    - Ministry of Development Planning (MoDP)
    - Ministry of Communications, Science and Technology
    - Department of Environment (DoE)

- Participating Ministries:
    - Ministry of Gender, Youth, Sports and Recreation (GYSR)
    - Ministry of Small Business, Cooperatives and Marketing (MSBCM)
    - Ministry of Social Development (MoSD)
    - Ministry of Health

3.3   Disadvantaged/vulnerable individuals or groups[2]

Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following: the most vulnerable and disadvantaged communities, marginalized groups, vulnerable women, people living with disabilities, and sexual and gender minorities who may be discriminated against in the implementation of the project including exclusion from training or operating the new systems.

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

4.   Stakeholder Engagement Program.

4.1.   Summary of stakeholder engagement done during project preparation

During project preparation, a number of meetings were held between MoF, beneficiary Ministries and the World Bank Mission. Refer to Annex 1 for details.

As part of stakeholder engagement in preparing the Lesotho Public Sector Foundations for Service Delivery Project (LPSFSDP), MFDP will be the lead implementing agent through its various departments at Head Office and its District structures. The Implementation will be done through a Project Implementation Team (PIT) under the supervision of the Director Planning of the Ministry of Finance and Development Planning (MFDP). The Ministry will be responsible for the overall coordination, supervision and monitoring, with the assistance of other Government Agencies as programme components may demand.

As part of the current consultations during the preparation of LPSFSDP, the MFDP are engaged in ongoing dialogue with all stakeholders within the Public Service Delivery Sector. They have informed the main stakeholders on the Project design, indicated its openness for feedback on the Project design, and informed them on the applicability of the WB's ESF to LPSFSDP.

The initial, consultations took in January 2022, and also in August 2023, the main purpose being to introduce the project and gather stakeholders' views and perceptions on the proposed project. The Project will conduct more in-depth stakeholder engagement throughout Project implementation.

A summary of the main recommendations received and integrated into the Stakeholder Engagement Plan is provided in Annex 1.

4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement.

The Public Service Sector has a range of stakeholder groups as earlier identified. These include District Administration Structures, Ministry Officials and the general public. The Ministry of Finance and Development Planning Information Office will be responsible for coordination of all these events and will keep a schedule of implementation of all outreach activities and will report on progress. These groups will be engaged by use of different platforms including:

- Interviews
- Surveys, polls, and questionnaires for beneficiary feedback
- Public meetings, workshops, and/or focus groups on specific topic.
- Participatory methods
- Other traditional mechanisms for consultation and decision making.

Table 4-1   Stakeholder engagement techniques

ENGAGEMENT TECHNIQUE	APPROPRIATE APPLICATION OF THE TECHNIQUE
Correspondences (Phone, Emails)	• Distribute information to Government Ministries, departments, Agencies and officials. • Invite stakeholders to meetings and follow-up
One-on-one meetings	• Seeking views and opinions • Enable stakeholder to speak freely about sensitive issues. • Build personal relationships. • Record meetings
Formal meetings	• Present the Project information to a group of stakeholders. • Allow group to comment – opinions and views. • Build impersonal relation with high level stakeholders. • Disseminate technical information. • Record discussions.
Public meetings (following COVID-19 guidelines)	• Present Project information to a large group of stakeholders. • Allow the group to provide their views and opinions. • Build relationship with the stakeholders, especially those impacted. • Distribute non-technical and technical information. • Facilitate meetings with presentations, PowerPoint, posters etc. • Record discussions, comments, questions.
Focus group meetings	• Present Project information to a group of stakeholders (8- 15 people groups) • Allow stakeholders to provide their views on targeted baseline information. • Build relationships with the stakeholders. • Record responses.
Project website	• Present project information and progress updates. • Disclose SEP, GRM and other relevant project documentation.
Project leaflet	• Brief project information to provide regular update. • Site specific project information.
Surveys	• Gathering opinions and views from individual stakeholders. • Gather baseline data. • Record data. • Develop a baseline database for monitoring impacts.
Workshops	• Present project information to a group of stakeholders. • Allow a group of stakeholders to provide their views and opinions. • Use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies. • Record responses.

Below table is a preliminary snapshot of stakeholder engagement needs:

Table 4-2   Stakeholder Engagement Needs.

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs
District level	• Government Officials • District Administrators • Extension Officers • Health Workers	• Approximate households, • Births and Deaths Registration • National ID Registration	Sesotho and English	Trained officials use Written information, radio, Pitso's/meetings.	Access to different media.
National Level.	• Other collaborating institutions. • Government Ministries and Departments.	• Births and Deaths Registration • National ID Registration • Interoperability of data bases. • Information sharing.	Sesotho and English	Trained officials use Written information, radio, Pitso's/meetings	Access to different media.

4.3   Stakeholder engagement plan

Table 4-3   Stakeholder Engagement Plan

Project component/Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Methods Used	Target Stakeholders	Issues Raised /Expected Decisions	Responsibilities
Project Preparation Phase						
Project Components	Prior to project appraisal	Proposed project components	• Focus groups Meetings • One on one interviews • Virtual and physical workshops • public hearings;	All	• Issues with current status. • proposed project improvements • accessibility and mobility in the project area	• WB • MoF
ESF Instruments	As soon as each individual deliverable is completed/ the documents are elaborated. The documents will be available for comments for a period of two weeks.	Stakeholder consultation on all draft documents: ESMF SEP ESCP	Administration of an Electronic Questionnaire, Emails, letters to stakeholders with appropriate background information and SEP,	All	Disclosure of the documents Enabling key stakeholders to provide their opinion, feedback, suggestions on the technical, environmental and social assessments. Integrate and address raised suggestions, opinions and considerations in the assessments.	• WB • MoF
Project Implementation Phase						
Component 1: Expenditure management strengthening.:						

Project component/Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Methods Used	Target Stakeholders	Issues Raised /Expected Decisions	Responsibilities
Sub-Component 1.1. *Budget System Coverage.*	• Quarterly	• strengthen budget preparation practices. • enhance controls over the execution of the budget. • upgrading of the information systems •	Emails and letters used to provide background information. Workshops. • Public meetings;	• Beneficiaries Ministries • payment service providers	• collaboration, and integration of systems. • managing and recording sources of revenue, • enhancing the functionality of the Integrated Revenue Management System (IRMS). • Enhancing data storage • reducing of administrative costs	• MoF
Sub-Component 1.2. *Public Investment Effectiveness.*	• Quarterly	• public investment management reforms • improved prioritization of projects for the Public Sector Investment Program	Training Workshops. Public meetings;	Beneficiaries Ministries	• strengthening the Public Sector Investment Committee's technical capabilities, • reactivating the planning cadres within the Ministry of Finance and Development Planning (MFDP) • Training on database issues.	• WB • MoF • Beneficiary Ministries
Sub-Component 1.3. *Asset Management Development.*	• Quarterly	• regulatory, organizational, data and procedural changes needed. • design and roll out of an asset management system	• Surveys, Public meetings	• social grant programs. • payment service providers. • MoSD staff	• functional design of the unit that would lead the system, • development of a training program and the first trainings for asset management leads in MDAs. • Physical Count of Government assets. • generation of E-Waste as system is expanded	• WB • MoF • Participating Ministries.

Project component/Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Methods Used	Target Stakeholders	Issues Raised /Expected Decisions	Responsibilities
Sub-component 1.4. *Public Procurement Reinvention.*	quarterly	• efficiency and effectiveness of the public procurement system • Establishment of the Lesotho Public Procurement Regulatory Authority	Training Workshops. Public meetings	• MoF Staff. • Beneficiary Ministry staff. • District staff.	• Implications of the Public Procurement Act • Functions of the Lesotho Public Procurement requirements of the Regulatory Authority. • Procurement Act	• MoF • Participating Ministries
Component 2: Human Resource Management and Organizational Transformation:						
Sub-component 2.1. HRMIS enhancements.	Monthly	• upgrading of the information systems • Linking different databases. • GBV/SEA in the establishment and operation of integrated systems	Reports Public hearings/ Press releases. project website/ Platform •	• payment service providers • MoF staff • Beneficiaries Ministries	• collaboration, and integration of systems, • Issues of data migration from old to new HRMIS databases. • digitization of personnel records within the HR management system • generation of E-Waste as system is expanded	• MoF • Participating Ministries
Sub-Component 2.2. Functional and regulatory reform.	Monthly	• review of HR legislation and existing regulations • functional reviews of beneficiary ministries for ministerial restructuring	• Workshops. • Public meetings	• MoF staff • Beneficiaries Ministries	• Issues of policy development	• MoF Participating Ministries
Sub-component 2.3. Capacity development and change management.	Quarterly	• human resource practitioners training • digitization of HR processes • leadership training	• Reports • Meetings/ workshops. • project website/ Platform	• Ministry of Public Service, Labour and Employment	• Human Resources issues • change management	• MoF Participating Ministries

Project component/Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Methods Used	Target Stakeholders	Issues Raised /Expected Decisions	Responsibilities
				• Beneficiary Ministries		
Sub-component 2.4. *Leadership Coaching for Senior Officials.*	Quarterly	• Effectiveness of financial literacy training • Acquisition of life skills	Reports Meetings/ workshops. project website/ Platform	*Senior Officials from beneficiary Ministries*	• Level of financial literacy of beneficiaries. • Specific investments with good returns. • Efficiency of service delivery.	MoF WB
Component 3. **Shared digital government foundations**:						
Sub-Component 3.1. *Enabling Environment.*	Quarterly	• Development of policies, regulations, and procedures • secure and seamless data sharing among Ministries • the use of shared digital public infrastructure	Emails, letters used to provide background information, Workshops, • Public meetings,	• MoF • District Staff. • beneficiary Ministries	• Policy issues • Data Security issues • New positions: Chief Digital Officer, Chief Information Security Officer, Chief Technology Officer	• MoF • Participating Ministries
Sub-Component 3.2 *Digital Platforms and Solutions.*	• Quarterly	• digital infrastructure and platforms • IT system updating using expert consultants, and investments in IT. • moving from individualized systems to interconnected systems. • bringing Government transactions and services online.	Reports Meetings/workshops. project website/ Platform Emails, letters used to provide background information.	beneficiary Ministries	• resilience of data infrastructure • Efficiency in the Business of Government. • reducing of administrative costs • Decentralization of Databases. • Ease of data sharing of Different Ministries' registries and databases.	• MoF • Participating Ministries

Project component/Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Methods Used	Target Stakeholders	Issues Raised /Expected Decisions	Responsibilities
Sub-component 3.3. *Change Management.*	• Quarterly	• Effectiveness of financial literacy training • Acquisition of life skills • Promotion of uptake of e-Services. •	Reports Public hearings/ Press releases. project website/ Platform	Staff of Beneficiaries Ministries	• Level of financial literacy of beneficiaries. • Specific investments with good returns • Issues of the digital capacity of government staff	• MoF • Participating Ministries
Component 4: Reform coordination and project management support.						
Component 4. Reform Coordination and Project Management Support.	Annually	Overall project implementation	Reports Public hearings/ Press releases. project website/ Platform	All	Present project implementation report; report on ESF documentation and grievances	• MoF • Participating Ministries

The information about the project that will be shared will include among many other issues,
- the project background,
- the theory of change,
- the summarized presentation of each of the project components and subcomponents,
- the SEP,
- Other relevant E&S documents,
- Grievance Mechanism (GM) procedures, including channels that complainants will be able to use.
- project orientation,
- regular updates on project developments,
- The environmental and social aspects of the project, including risks and measures.
- the project beneficiary's selection.

This information will largely be shared at the early stages of the project.

The shared information will be presented in document format to the participating and beneficiary Ministries and Departments, who will in-turn present it to their district offices. These documents will also be published in the Government of Lesotho website as well as the Ministry of Finance and Development Planning website, (http://www.finance.gov.ls/). There will also be presentations and discussions over scheduled radio and television platforms where Ministry Officials responsible for implementation, management and coordination of project activities will make presentations about the project as well as the progress update while engaging with the public and answering any arising questions.

The Ministry will also use the platforms below to reach more stakeholders:
- public notices,
- press releases,
- Project website, (To be established within three months of effectiveness)
- consultation meetings,
- information leaflets and brochures,
- Information centres and exhibitions or other visual displays,
- Brochures, leaflets, posters, nontechnical summary documents and reports,
- Official correspondence,
- Website, social media.

The strategy will also include means to consult with project-affected stakeholders if there are significant changes to the project resulting in additional risks and impacts.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

The Ministry of Finance and Development Planning (MFDP) through the Project Facilitation Unit (LPSFSDP-PIT) will be in charge of stakeholder engagement activities.

The budget for the SEP is US$ 375,000.00 and is included in component 3 of the project.

Table 5-1 Budget table.

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs	Remarks
1. Estimated staff salaries* and related expenses					
1a.Travel costs for staff	Indicative			20,000.00	
2. Events					
2a. Organization of focus groups, **Stakeholder Participation/meetings:** Conduct workshops to engage the identified stakeholders	Lumpsum		Continuous	90,000.00	• Stakeholder Engagement Workshops • Information Disclosure process • Engagement of NGOs based in the districts to gather feedback from citizens. • One Stop Shop/Citizen Services Outreach Days
3. Communication campaigns					
3a. Development of posters, flyers etc and communication	Lumpsum		Continuous	20,000.00	• Communication costs Telephone (including minutes for mobile phones), Internet, fax, courier • PA system (for events) • Local travel to meet with stakeholders (mileage) •
3b. Conducting social media campaign]	Lumpsum		Continuous	15,000.00	• Computer, printer, back-up drive, thumb drives, Internet access
4. Trainings					
4a. Conduct Comprehensive training for PIU and contractor staff in stakeholder engagement, social/environmental issues, so that they become proficient in the process throughout the project life.	5	**5,000.00**	continuous	**25,000.00**	• Training Facilities including Room rental, Trainer/facilitators etc, • Training materials, duplication, printing, binders, etc. • Travel to districts and per diem.
4b.Training on gender-based violence (GBV) for Project Implementing Unit (PIU) and contractor staff	5	5000.00	First two year of the project	**25,000.00**	
5. Beneficiary surveys					
5a. Detailed Stakeholder Identification and Analysis:	Lumpsum		First six months of project.	40,000.00	• Stakeholder Participation/consultation

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs	Remarks
• Conduct a comprehensive participatory stakeholder mapping exercise including roles and responsibilities at national, provincial, district and local area level. • Conduct adequate situational assessment to determine different vulnerability dimensions.					exercises including field visits to Beneficiary sites. • Lump Sum for all District for over the entire project period to cover travel costs, allowances, w/shops, etc **Venue:** Head Office and all district
5a. Conduct a mid-project perception survey.	1	15,000.00	Mid-Term	15,000.00	Mid-Term perception survey
5b. Conduct an end-of-project perception survey.	1	15,000.00	End-of-project	15,000.00	End-of-project perception survey
6. Grievance Mechanism					
6a.Training of GM committees • Conduct workshops to disseminate the developed GRM	Lumpsum		Continuous	20,000.00	• Stakeholder GRM Workshops to publicise the GRM
6b. Establishing and installing suggestion boxes at Head Office, Participating Ministries and District Offices	Lumpsum		Continuous	30,000.00	
6c. Establish a call centre with a team of social workers Development and reproduction of GM communication materials	Lumpsum		Every six months	60,000.00	• Materials development (brochures, leaflets, thank-you cards, other items) • Translation Printing costs T-shirts, condoms, bags, etc
7. Other expenses					
costs to conduct an effective Stakeholder Engagement process.	lumpsum		continuous	30,000.00	•
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				375,000.00	

Note: *Salary costs can be indicative.

5.2 Management functions and responsibilities

The entities responsible for carrying out stakeholder engagement activities are The Ministry of Finance and Development Planning (MFDP) through the Project Implementation Unit (LPSFSDP-PIT). In particular the LPSFSDP-PIT – Environmental and Social Specialist will be responsible for the establishment and running of the Grievance Redress Mechanism.

6. Grievance Mechanism.

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

6.1 Description of GM

Table 6-1 GRM

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	The Grievance Redress Mechanism will consist of designated personnel at the LPSFSDP PIT head office, Beneficiary Ministry Offices, and District Offices. The Mechanism will in general have the following components: - • The access point for impacted/concerned people will be situated as close to the beneficiaries as possible. LPSFSDP PIT staff will be responsible for receiving the grievances, classifying, and logging them. • An acknowledgement of receipt should be given to the complainant containing an expectation of when they will receive a response. • The grievance is then Assessed and investigated to identify all the key facts. • A resolution is then arrived at, and the proposed actions are confirmed with LPSFSDP PIT /Ministry of Finance and Development Planning senior members of staff. • A response is then communicated to the complainant within the timescale promised. • The complainant is given room to appeal to the Ministry of Finance and Development Planning or the Courts of Law if they are not satisfied with the response. • Once done the case is brought to a closure and all the staff members of LPSFSDP PIT are made aware of the complaint, any underlying issues and plans to prevent any future recurrence of the issue.		
Grievance uptake	Grievances can be submitted via the following channels: • Toll-free telephone hotline/Short Message Service (SMS) line, (Project Hotline to be established within three months of project effectiveness). • E-mail.(Project e-mail address to be established within three months of project effectiveness). • Letter to Grievance focal points at local facilities (Project address for sending GRM issues will be established within three months of project effectiveness. Initially the Ministry address will be used: LPSFSDP, PO Box 395, Maseru 100, Lesotho, Tel: +266 2231 1101. Fax: +266 2231 0964.) • Complaint form to be lodged via any of the above channels. • Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box. The uptake channels will be publicized and advertised via local media and the implementing agency. Verbal complaints should be recorded by staff for them to be considered. Many complaints may be resolved 'on the spot' and informally by the RDDP 2 staff but should also be logged in order to (i) encourage responsiveness; and (ii) ensure that repeated or low-level grievances are being noted in the system. The GRM should have the ability to handle anonymous complaints.		

Step	Description of Process	Time Frame	Responsibility

Sorting, processing	Any complaint received is forwarded to the Environment and Social Specialist (ESS) or his/her designated officer, logged in the Grievance Logbook, and categorized according to the following complaint types:
	
	• **Category 1 – urgent**, potential high health and high business impact. **This require a response to the Complainant within three (3) working days.**
	  o This should be used (sparingly) for major health issues where the complaint may have disastrous impacts on either human, the environment or RDDP 2 itself.
	  o Also, this could be used in a situation where the complainant may be in a position to influence or make public statements that would impact upon the RDDP 2 reputation.
	
	• **Category 2, - non-urgent**, lower health environmental and social impact. This requires a response to the complainant within 2 working weeks.
	  o This should be used for most complaints with individual stakeholders, as this allows a reasonable time to collect information and produce a balanced response.
	Discretion and flexibility should be exercised in categorising all complaints:
	• The staff member logging the complaint should review the complaint and its priority with the Project Manager before proceeding to the next step.
	• The Project Manager will decide on the appropriate person(s) to carry out subsequent steps, including the investigation.
	• **All Category 1 complaints must be escalated immediately to the** Project Manager.
		Upon receipt of complaint	Local grievance focal points

Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by formal written acknowledgement, containing an expectation of when they will receive a response, and the person dealing with it. All complaints, regardless of priority, should receive a pro forma acknowledgement sent out by mail on the day of receipt.	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by Environment and Social Specialist (ESS) or his/her designated officer, through an assigned officer. A proposed resolution is formulated by the assigned officer and communicated to the complainant by the Project Manager.	Within 10 working days	Complaint Committee composed of …, … and …
Monitoring and evaluation. Appeal & Follow.	Data on complaints are collected in project grievance log form and reported to the project monthly Management meeting every month. The project grievance log form will contain record of the person responsible for an individual complaint received, and records dates for the following events: 1. Date of the received complaint. 2. Name of the PAP complaining (optional) 3. Status of the complaint 4. PAP Confidentiality/Identity 5. Signatures of the PAP complaining 6. Signature of committee representative 7. How and who addressed the complaint 8. Dates when the complaint was addressed.		

Step	Description of Process	Time Frame	Responsibility

	The complaints must be followed up to confirm that the complainants are satisfied with the response given. If not satisfied the Complainant is advised on the route for Appealing
	• All Category 1 complaints and 95% of Category 2 complaints must be followed up within a reasonable timescale.
	• This will be carried out by the Project Manager's office.
	• The follow-up should identify the following:
	    o Is the complainant satisfied with the response?
	    o Did they feel that their complaint was properly and fairly handled?
	
	• Any negative responses to these questions should be referred to the Project Managers for action and direct follow up with the complainant.
	• The complainant is given room for appealing to the Ministry of Finance and Development Planning or Courts of Law if he is not satisfied.		

Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected in the project grievance log book as part of the closure of the case.		
Training	Training needs for staff/consultants in the PIU, Contractors, and Supervision Consultants are as follows: • Public relations. • Conflict resolution. • Establishment of GRMs • GBV/SEA at workplaces. •		
If relevant, payment of reparations following complaint resolution	Ensure that the LPSFSDP PIT as a whole is aware of the complaints and any underlying issues. The Project Management will then determine the reparations on a case-by-case basis. The LPSFSDP PIT will then Plan actions to remove these and prevent future recurrence. • All complaints should be reviewed monthly as part of the quality assurance review meetings. • Any complaints where action can be taken to avoid recurrence must be acted upon and raised with the appropriate managers/teams across the LPSFSDP PIT.		

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

If needed, the project will adopt other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH.

There is a Labor Grievance Mechanism, which is included in the Labor Management Procedures and workers can use it. The Formal Grievance Procedure should be known and explained to the employees and should at least:

a) Specify to whom the employee should lodge the grievance.
b) Refer to time frames to allow the grievance to be dealt with expeditiously.
c) Allow the person to refer the grievance to a more senior level within the organization, if it is not resolved at the lowest level.
d) If a grievance is not resolved the employee has the right to lodge a dispute with the employer.

All the contractors who will be engaged for the project will be required to produce their grievance procedure as a requirement for tender which at a minimum comply with these requirements. In addition, good international practice recommends that the procedures be transparent, is confidential, adheres to non-retribution practices and includes the right to representation. After they are engaged, they will be required to produce proof that each employee has been inducted and signed that they have been inducted on the procedure.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

7. Monitoring and Reporting

7.1 Summary of how SEP implementation will be monitored and reported

As part of the SEP, a mechanism for providing feedback to the stakeholders on their information needs will be set up. In addition, the SEP will include means for monitoring the effectiveness of the public consultation processes and outcomes from consultations, and for determining where further action may be necessary regarding engagement.

Two distinct but related monitoring activities in terms of timing will be implemented:

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

A series of key performance indicators for each stakeholder engagement stage have been developed. Table 10-1 shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Table 7-1 Key Performance Indicators by Project Phase

No.	PHASE ACTIVITIES	ACTIVITIES	INDICATORS
1.0	Planning for Project	Share updates on Project activities	Posters displayed in allocated service centres by time specified
2.0	GRM, SEP and other project	Share updates on SEP, GRM and other project specific documents activities	• Posters displayed in allocated service centres by time specified.

		• Affected community stakeholders will have received and understand the information disclosed and attended the public meetings. • Communities provided feedback. • No complaints about non-receipt of project specific documents received.
specific documents Implementation		

The identification of LPSFSDP related impacts and concerns is a key element of stakeholder engagement that will occur over the complete LPSFSDP life cycle. As such, the identification of new concerns, impacts and grievances as the GRM and LPSFSDP progresses will serve as an overall indicator for the implementation of the stakeholder engagement process.

During the LPSFSDP implementation there will be a review of the engagement activities conducted; levels of stakeholder involvement; the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the SEP as well as other project specific documents.

7.2 Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of project implementation. Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. The quarterly summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways:

Table 7-2 Way of information dissemination to Stakeholder.

Community	Stakeholder group	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs
District level	• Government Officials • District Administrators	Sesotho and English	Trained officials use Written information, radio, Pitso's/formal meetings, Project Website and workshops.	Access to different media.
National Level.	• Other collaborating institutions. • Government Ministries and Departments.	Sesotho and English	Trained officials use Written information, radio, Pitso's/ formal meetings, Project Website and workshops.	Access to different media.

8. ANNEXES

ANNEX 1.   THE STAKEHOLDER CONSULTATION PROCESS.

1.0   INTRODUCTION

This annex contains the details of the consultations that were conducted for the development of the SEP. The consultations included administration of the questionnaire (Annex 4), One on One interviews and group discussions.

2.0   THE STAKEHOLDERS WHO WERE CONSULTED

Table ANN 1-1   Consulted Stakeholders

No.	Institution	Contact Person (Name and Designation)	Contact Details (E-mail and Phone number)
1.0	**Implementing Agency**		
1.1	Ministry of Finance and Development Planning- Budget	Ms. Maleshoane Lekomola-Danziger	Maleshoane.lekomola@gov.ls/58642404
	Planning Unit	Mr. Molise Koto	Molise.koto@gov.ls/58844726
2.0	**Key Beneficiary Ministries.**		
2.1	Planning	Ms. Ntsiuoa Jaase (Lead-1)	Ntsiuoa.jaase@gov.ls/50832562
	Budget	Ms. Mannyali Malefane	malipalesam@gmail.com/62454407
	Asset Management	Mr. George Mokhethea	ggmokhethea@gmail.com/58042847
	Consolidate TSA	Ms Tseleng Putsoa	tselengputsoa@yahoo.com/58963286
	PCM	Mrs. Mannete Seoli	mannete.seoli@gov.ls/58903208
	PPAD	Mr. Likotsi Leseli	lb.leseli@yahoo.com/58794305
	IRMS/IFMIS	Mrs. Maphantsi Sekhesa	maphantsi.sekhesa@gov.ls/58034394
		Mrs. Litlhare Molemohi- Phori	lmolemohiphori@gmail.com/58414187
		Ms. Khoboso Letsema	khobosoletsema@gmail.com/58546481
2.2	Ministry of the Public Service, Employment and Labour	Mr. Pheko Mashoai (Lead-2)	pheko.mashoai@gov.ls/58787168
		Mrs. Lerato Monyane	monyanelerato62@gmail.com/62703722
		Ms. Tankiso Masao	Tankiso.masao@gov.ls/62467502
		Mr. Matheakoena Lekhoaba	wwmathe@yahoo.com/62260606
		Ms. Manneheng Sefeane	manneheng.sefeane@gov.ls/58850290
		Ms. Nthabiseng Shale	Thabzene05@gmail.com/63004505
2.3	Ministry of Information, Communications and Technology	Mr Thapeli Tjabane (Lead-3)	thapeli.tjabane@gov.ls/50923807
		Mr Khiba Masiu	khiba.masiu@gov.ls/58093188
3.0	**Other participating Ministries**		

3.1	Ministry of Local Government, Home Affairs and Police	Mr. Mpiti Sekhesa	mpiti.sekhesa@go.ls/62010106

3.0   THE CONSULTATION PROCESS.

The following are a sample of the responses to the administered questionnaire from the stakeholders:

3.1   Consultation with Mr. Likotsi Leseli

KINGDOM OF LESOTHO

MINISTRY OF FINANCE AND DEVELOPMENT PLANNING (MFDP)

LESOTHO PUBLIC SECTOR FOUNDATIONS FOR SERVICE DELIVERY PROJECT (LPSFSDP).

P174171

SEP QUESTIONAIRE

MINISTRY/ ORGANISATION   *Finance and Development Planning*..

PHYSICAL ADDRESS   *Hight Court Corner Road, ...Finance House - 3rd Floor, PPAD Office, Room 3018. Maseru.*

NAME OF REPRESENTATIVE ...*Nthoateng Lebona - PS Finance and Development Planning*

PHONE NUMBER   *22324116*............... E –MAIL ADD: *lb.leseli@yahoo.com*................................

The Government of Lesotho through the Ministry of Finance and Development Planning (MFDP) is in the process of preparing the Lesotho Public Sector Foundations for Service Delivery Project (LPSFSDP) with World Bank technical and financial support. The proposed LPSFSDP, aims to support the modernization of the public sector to increase efficiency and improve service delivery in Lesotho. The project will support the Government of Lesotho to shift toward more efficient, accessible and resilient models of government operation, service delivery and interaction with citizens, including through digitization. In essence the project will be addressing foundational issues of governance, government capacity and digitalization by doing three things:

1) building on the main achievements of the previous Public Sector project by continuing to strengthen public financial management systems, their usage, and extension to other areas of government (component 1),

2) responding to the Government's priorities around more effectively controlling the wage bill and streamlining government operations (component 2),

3) supporting the digital transformation agenda by leveraging technology to improve public sector services and delivery mechanisms (component 3).

The activities will directly and indirectly generate impacts that may result in social conflicts, incidences of E-waste and solid waste generation, and promotion of GBV/SEA incidences. Consequently, several environmental and social components will potentially be affected in one way or the other by such activities which necessitates the preparation of an environmental and social safeguards instrument.

1.0 IMPLEMENTATION/OPERATION PHASE

As the project is being implemented it will generate various social and environmental impacts. In your view, what Environmental, and Social impacts do you foresee during this implementation stage of the project?

1.1 Environmental Issues: *(e.g., Pollution due to solid waste, hazardous waste and end of life E-waste from the provided computers, laptops, solar panels and battery packs.)*

There will be environmental pollution due to solid waste that would be poorly managed

....

1.2 Social Aspects:

i. **Social Impacts:** *(e.g., Increased incidence of social conflicts, promotion of GBV/SEA incidences, Not applying the GRM, unfair selection of beneficiaries, participation of Beneficiary Ministries etc.).*

Social conflict due to unclear criteria on selecting benefiaries.

....
....

i. **Economic Aspects:** How is the project going to affect the business of Government/economic base? (e.g., Adequacy of services, interoperability of databases, efficiency of Budgetary processes, etc)

Negative impact on economic because it is not ownership driven by the indigenous stakeholders.

....
....

1.3 What are the Possible Interventions you would like to see being implemented *to prevent or minimise the impacts?* (e.g., E-waste management, protection of Women against GBV/SEA, special considerations for minority groups, upholding of occupational health standards; etc.)

The key beneficiaries and stakeholders have to be sensitized about its expected outcomes for their appreciation and support

....

2.0 ANY OTHER COMMENTS
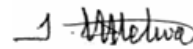
Anything that is intended to benefit the local citizens should not be donor driven, rather it should be initiated and technically supported by the experts within the country.

....

SIGNED.

...... Likotsi Leseli	....	......05/10/2023.................
INTERVIEWEE	INTERVIEWER	DATE

3.2 Consultation with Mr. Tsiuoa Jaase

KINGDOM OF LESOTHO

MINISTRY OF FINANCE AND DEVELOPMENT PLANNING (MFDP)

LESOTHO PUBLIC SECTOR FOUNDATIONS FOR SERVICE DELIVERY PROJECT (LPSFSDP).

P174171

SEP QUESTIONAIRE

MINISTRY/ ORGANISATION *FINANCE AND DEVELOPMENT PLANNING*...

PHYSICAL ADDRESS *AFRICA HOUSE*, ...

NAME OF REPRESENTATIVE *TSIUOA JAASE*...

PHONE NUMBER *50832562*........................ E –MAIL ADD............ *ntsiuoa.jaase@gov.ls*...

The Government of Lesotho through the Ministry of Finance and Development Planning (MFDP) is in the process of preparing the Lesotho Public Sector Foundations for Service Delivery Project (LPSFSDP) with World Bank technical and financial support. The proposed LPSFSDP, aims to support the modernization of the public sector to increase efficiency and improve service delivery in Lesotho. The project will support the Government of Lesotho to shift toward more efficient, accessible and resilient models of government operation, service delivery and interaction with citizens, including through digitization. In essence the project will be addressing foundational issues of governance, government capacity and digitalization by doing three things:

1)   building on the main achievements of the previous Public Sector project by continuing to strengthen public financial management systems, their usage, and extension to other areas of government (component 1),

2)   responding to the Government's priorities around more effectively controlling the wage bill and streamlining government operations (component 2),

3)   supporting the digital transformation agenda by leveraging technology to improve public sector services and delivery mechanisms (component 3).

The activities will directly and indirectly generate impacts that may result in social conflicts, incidences of E-waste and solid waste generation, and promotion of GBV/SEA incidences. Consequently, several environmental and social components will potentially be affected in one way or the other by such activities which necessitates the preparation of an environmental and social safeguards instrument.

1.0 IMPLEMENTATION/OPERATION PHASE

As the project is being implemented it will generate various social and environmental impacts. In your view, what Environmental, and Social impacts do you foresee during this implementation stage of the project?

1.1 Environmental Issues: *(e.g., Pollution due to solid waste, hazardous waste and end of life E-waste from the provided computers, laptops, solar panels and battery packs.)*

None

....

1.2 Social Aspects:

i. **Social Impacts:** *(e.g., Increased incidence of social conflicts, promotion of GBV/SEA incidences, Not applying the GRM, unfair selection of beneficiaries, participation of Beneficiary Ministries etc.).*

None

....

Economic Aspects: How is the project going to affect the business of Government/economic base? (e.g., Adequacy of services, interoperability of databases, efficiency of Budgetary processes, etc)

I do not foresee any negative economic impact

....

....

1.3 What are the Possible Interventions you would like to see being implemented *to prevent or minimise the impacts*? (e.g., E-waste management, protection of Women against GBV/SEA, special considerations for minority groups, upholding of occupational health standards; etc.)

I am looking at the project basically from a sub-component of component 2, which is capacity building of planning cadre. I am sure other component leaders will identify negative impacts which warrant serious interventions. But talking in broad terms I foresee a strong need of stakeholder engagement in order to promote ownership of the project and minimise any possible negative impact that maybe caused by misinformation.

2.0 ANY OTHER COMMENTS
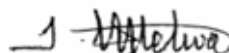
None...

....

SIGNED.

...... TSIUOA JAASE ....05/10/2023...........

INTERVIEWEE   **INTERVIEWER**   **DATE**

4.0 SUMMARY OF THE RESPONSES FROM THE CONSULTATION PROCESS

The following is a summary of the responses of the consultation process in line with the general questions which were being asked:

4.1 Environmental Issues: *(e.g., Pollution due to solid waste, hazardous waste and end of life E-waste from the provided computers, laptops, solar panels and battery packs.)*

Feedback: Based on the overview of the project The issue that was foreseen to be a likely cause of some level of environmental impact was the potential disposal of end-of-life ICT equipment like computers, savers, laptops, batteries, and solar panels to be used under the project. There was contention however that in Lesotho because of the rarerity of hardware, these components are so valuable that laptops usually have secondary use beyond the primary expected lifespan and that in many instances these end up getting fixed as opposed to being disposed of. The use of a laptop in a country such as Lesotho tends to really be long. It was suggested that the offset of the effects of this may be very long term.

4.2 Social Issues: *(e.g., Increased incidence of social conflicts, promotion of GBV/SEA incidences, special considerations for disadvantaged, poor communities.)*

Feedback: It was postulated that the social issues from the perspectives are very limited and there was a concern that maybe resources are being channeled in this instance towards issues that may not be as critical. Potential social issues that were raised included:

- GBV/SEA in the workplace,
- Discrimination of disadvantaged women in such areas as training and operating the new systems.
- vulnerable groups at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, and displaced persons.
- Stakeholders not well informed about the details of the project to make informed decisions about their participation and involvement.
- Stakeholders not identifying with the project.
- Possibility of project not being sustainable beyond project life cycle.
- Unfair treatment of beneficiary Ministries, from unclear selection criteria to unequal participation.

4.3 What are the Possible Interventions you would like to see being implemented *to prevent or minimise the impacts*? *(e.g., E-waste management, protection of Women against GBV/SEA, special considerations for minority groups, upholding of occupational health standards; etc.)*

The stakeholders emphasized the need for risk preparedness as opposed to managing the eventuality in due course. The mitigation measures that were proffered included:

Social Issues:

- Ensure a buy-in process for all potential stakeholders for the programme.
- All relevant stakeholders should be continuously involved and attend meetings from planning to implementation.

- Integrate gender sensitive approaches into all activities including training and employment.
- Inform and encourage beneficiaries to use project's SEA-Grievance and Redress Mechanism (GRM) to report any misconduct.
- Conduct training needs assessment, and upgrade, and update knowledge, skills of all Public Service practitioners.
- Early on in the project, plan and design project exit in terms of determining whether beneficiaries will continue without the project.
- Disseminate sufficient information for stakeholders to make informed decisions and participate freely.
- Institute transparent and fair selection procedures, treating all beneficiaries equal and keep them all informed.

Environmental Issues:
- Collect and store in a lockable area, all potentially hazardous waste (end of life laptops and computer components, batteries, solar panels, etc.), for onward transportation back to supplier, recycling facility or proper disposal site.
- Institute proper E-Waste management approaches, including proper transportation of potentially hazardous waste.

ANNEX 2.   GRIEVANCE REGISTER FORM - TEMPLATE.

Identifiers			About the PAP					About the Complaint					Method of Resolution	Escalation	Notes
ID	Date received	Date closed	Name & Surname	District	Ministry/Department	Stakeholder (Individual or Entity)	Reporting method (F2F, suggestion box, online, social media, email, in writing, feedback forms)	Type of grievance (administrative or operational)	Root cause of the grievance (see also Explanations tab and List of Root Causes)	Outcome	If a resolution was offered please indicate 'accepted' or 'not accepted'.	Methods of resolution (optional) e.g.: negotiated, mediated, apology	Escalation of grievance (e.g., Courts)	

Explanations of fields in the Grievance Register

Type of grievance (please indicate 'administrative' or 'operational')	Please indicate whether the grievance was classified as 'administrative' or 'operational' in nature, according to the Complaints and Grievances Procedures.
Service provider	Government or private
Root cause of the grievance (if possible, please choose cause from list under the Explanations tab)	Please name the process or type of decision that was the root cause of the grievance.
Escalation of grievance (i.e.: School board, PIT)	Please indicate if you are aware of the stakeholder pursuing the matter further through other avenues outside the PIT. If not known, indicate 'unknown'. The timelines for external reviews can be lengthy in many cases. Information in this column will only reflect what is known at the time of reporting, either via notification by the external body or stakeholder.

ANNEX 3.   GRIEVANCE LOG FORM.

GRIEVANCE LOG

Month: _____	
Year: _____	

Date Grievance Filed: _____

Grievance entered by (Staff person): _____

Reported to Facility Administrator/Farm Manager?   Yes ☐   No ☐

Facility Administrator/Farm Manager's Signature: _____

Name of Grievant: _____

Description of Grievance:

_____
_____
_____
_____
_____
_____

Actions/Steps Taken:

Date: _____   Actions/Steps completed by (Staff person): _____
_____
_____

Date: _____   Actions/Steps completed by (Staff person): _____
_____
_____

Date: _____   Actions/Steps completed by (Staff person): _____
_____
_____

Resolution:

_____
_____
_____

Was the grievant provided a verbal explanation of the above resolution?
Yes ☐   No ☐   Date: _____

Was the Grievance escalated?
If so to whom: _____
*Please attach any documentation regarding the escalation of the grievance.

Was Acknowledgement Letter Provided? Yes ☐ No ☐ Date: _____	
Was Outcome Letter Provided? Yes ☐ No ☐ Date: _____	

NOTE: The identity of the complainant is optional. The grievance log can be either anonymous or kept confidential.

Figure 1   Grievance Log.

Endnotes

[1] For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties:** Persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Other Interested Parties:** Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.
- **Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.
- It is important to note that sometimes projects have different components with very different sets of stakeholders for each component. Those different stakeholders should be considered in preparing the SEP.

[2] It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project, and to ensure that awareness raising and stakeholder engagement be adapted to take into account such groups' or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full understanding of project activities and benefits. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input into the overall process are commensurate with those of other stakeholders.