



Malawi Emergency Power Restoration Project

(P178914)

**STAKEHOLDER ENGAGEMENT PLAN
(SEP)**

May 2022

Contents

1.	INTRODUCTION.....	6
1.1	Background.....	6
1.2	Project Description.....	6
2.	AN OVERVIEW OF STAKEHOLDER ENGAGEMENT.....	8
2.1	Aims of SEP.....	8
2.2	Principles of Stakeholders Engagement.....	9
2.3	Benefits of Stakeholder Engagement Plan.....	9
2.4	Stakeholder Engagement Approach.....	10
2.5	Stakeholder Identification and Analysis.....	16
2.5.1	Project Affected Parties.....	17
2.5.2	Other Interested Parties.....	19
2.5.3	Disadvantaged/Vulnerable Individuals or Groups.....	21
2.6	Stakeholder Engagement Activities.....	22
	Planned Stakeholder Engagement Activities.....	23
2.7	Monitoring and Reporting of Stakeholder Engagement Plan.....	25
3.	Proposed Strategy for Information Disclosure.....	27
3.6.3	Generic Stakeholder Engagement Action Plan.....	35
4.	RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES.....	37
5.0	GRIEVANCE REDRESS MECHANISM.....	40
5.1	IMPLEMENTATION ARRANGEMENTS FOR THE GRM.....	40
5.1.1	THE IMPLEMENTATION STRUCTURE AND HIERARCHY.....	40
5.2	THE GRM PROCESS.....	42
5.2.1	GRM STAGES.....	42
5.2.2	GRM APPROACH AND STEPS.....	43
ANNEX 1:	PROJECT GRIEVANCE LOG & RESOLUTION FORM.....	50
	GRIEVANCE/FEEDBACK LOG IN.....	50
	ASSESSMENT, RESPONSE AND CLOSURE.....	52

ABBREVIATIONS

ADC	Area Development Committee
CBOs	Community Based Organisations
DGRCs	District Grievance Redress Committees
ESCOM	Electricity Supply Corporation of Malawi

ESS	Environmental & Social Safeguards
ESMF	Environmental & Social Management Framework
E & S	Environmental & Social
ESMPs	Environmental & Social Management Plans
ESCP	Environmental & Social Commitment Plan
FGDS	Focus Group Discussions
GBV	Gender Based Violence
GRC	Grievance Redress Committee
HIV/AIDS	Human immunodeficiency virus/Acquired immunodeficiency syndrome
LMPS	Labour Management Plans
MDAs	Ministries, Departments & Agencies
MERA	Malawi Energy Regulation Agency
MP	Member of Parliament
M & E	Monitoring & Evaluation
MoF	Ministry of Finance
NGO	Non-Governmental Organisation
OIPs	Other Interested Parties
PAPs	Project Affected Persons
PDO	Project Development Objectives
PM	Project Management
PIU	Project Implementation Unit
POA	Project Operational Manual
RAPs	Resettlement Action Plan
SEA	Sexual Exploitation
SEP	Stakeholder Engagement Plan

VDC

Village Development Committee

WB

World Bank

WGRC

Workers Grievance Redress Committee

1. INTRODUCTION

1.1 BACKGROUND

Malawi was affected by a tropical storm, Cyclone Ana, which hit most parts of the Southern Region that resulted from a heavy downpour that lasted for about three days around January 24, 2022. This caused a lot of damage to infrastructure and the environment including peoples' homes, crop fields and road network.

The Cyclone affected hydro -power generation facilities of Kapichira Station belonging to Electricity Generation Company (Malawi) Limited that resulted in overtopping of the river training dike and fuse plug, erosion of the main dam slopes and damage to steel structures on the spillway bridge of the station. Apart from the permanent structures, the storm/floods washed away heavy machinery on the dike and water vessels from where they were docked. Such being the case, generation capacity amounting to 129.6MW was withdrawn from the national grid rendering Kapichira Power Station unavailable.

ESCOM's infrastructure affected by the Tropical Storm Ana include both transmission (132kV & 66kV) and distribution (33kV, 11kV and 400V lines) networks where several power line components have been affected. These include steel towers, wooden poles and structures, transformers, conductors and insulators among others. The damage caused by the tropical storm has been in various degrees including complete line sections, isolated structures and damage to specific equipment and materials in a manner that permanent rehabilitation works shall have to be a mixed bag comprising of complete line construction works, replacement of structures, and replacement of specific equipment and materials.

1.2 PROJECT DESCRIPTION

The proposed project has two main components as follows:

Component 1: Kapichira Hydropower Dam Rehabilitation and Strengthening (\$45million, led by EGENCO). This component will finance the return to resilient operation of the 130 MW Kapichira hydropower plant through the rehabilitation of Kapichira dam and spillways. The following phased approach is proposed to be implemented for the protection, rehabilitation and strengthening of Kapichira dam:

The following phased approach is proposed to be implemented for protection and rehabilitation of Kapichira:

Immediate actions mobilized by EGENCO for primarily and urgently restoring main spillway capacity while also kick-starting actions on the critical path for Kapichira dam rehabilitation such as collecting topographic data and assessing the quality of sand available in the reservoir for construction commencing sediment management studies, and removal of sediment from the reservoir.

Phase 1: Energy restoration to be implemented through raising water levels back to operational levels and by developing a temporary coffer dam upstream of the damaged infrastructure (the fuse plug and 200 m damaged section of the embankment dam) in order to restore impoundment of the reservoir. This would prevent further damage while protecting works for phase 2 and SVTP irrigation intake. Although the dam designs have not been developed, it is proposed to revise the designs of the irrigation intake to be incorporated in the dam wall. This phase would likely be supported by funding resources available under the SVTP project.

Phase 2: Build-back better: Based on a revised design that would integrate key technical and operational features that contributed to the failure, this phase would aim at (i) rehabilitating damaged infrastructure, (ii) upgrading the Kapichira power plant to enhance the resilience of the hydropower scheme, and (iii) supporting companion actions on O&M and importantly sediment management. Surface area of the reservoir should not be affected by revised design. Flow regimes should also not be affected (or very little). In case some sediment flushing occurs, the ESIA and sediment management strategy will make sure that adequate management of flows is proposed together with mitigation measures. This phase could be funded under a new WB emergency operation.

Component 2: Transmission and Distribution Network Restoration (\$15million, led by ESCOM). The damage caused by the tropical storm has been in various degrees including complete line sections, isolated structures and damage to specific equipment and materials in a manner that permanent rehabilitation works shall have to be undertaken comprising of complete line construction works, replacement of structures, and of specific equipment and materials. ESCOM's infrastructure affected by Tropical Storm Ana include both transmission (132kV & 66kV) and distribution (33kV, 11kV and 400V lines) networks where a number of power line components have been affected. These include steel towers, wooden poles and structures, transformers, conductors and insulators among others. The damage caused by the tropical storm has been in various degrees including complete line sections, isolated structures and damage to specific equipment and materials in a manner that permanent rehabilitation works shall have to comprise of complete line construction works, replacement of structures, and replacement of specific equipment and materials.

2. AN OVERVIEW OF STAKEHOLDER ENGAGEMENT

The Government of Malawi and the Utility Companies (ESCOM and EGENCO) augur that Stakeholder Engagement shall be free of manipulation, interference, coercion, and intimidation, and shall provide stakeholders with timely, relevant, understandable and accessible information in a culturally appropriate manner. It shall encourage interaction between Project implementer and identified groups of people and provide them with an opportunity to raise their concerns and opinions (e.g., by way of meetings, surveys, interviews and/or focus groups), and ensure that this information is taken into consideration when making project decisions.

2.1 Aims of SEP

The stakeholder engagement Plan aims at achieving the following:

- **Ensuring stakeholder understanding of the Project:** An open, inclusive and transparent process of culturally appropriate engagement and communication in Chichewa language to ensure that stakeholders are well informed about the proposed project including its environment and social risks and impacts as well as opportunities arising from the project work itself and wider benefits of the project to the communities.
- **Assessing the level of stakeholder interest and support for the project:** Identification and engagement of stakeholders by categories of marginalization, vulnerability, invisibility and intersectionality in order to obtain their views on the project's design, risks, impacts, mitigation measures, and benefits. This will enable stakeholders' views to be taken into account in project design and environmental and social performance.
- **Managing expectations:** It is important to ensure that the proposed Project does not create or allow unrealistic expectations to develop amongst stakeholders about proposed Project benefits. The engagement process will serve as a mechanism for understanding and managing stakeholder and community expectations, where the latter will be achieved by disseminating accurate information in an accessible way.
- **Providing stakeholders with accessible and inclusive means of raising issues and grievances:** This will allow establishing, publicizing and operating an accessible grievance mechanism aimed at receiving and facilitating resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution.
- **Ensuring compliance:** The process is designed to ensure compliance with both local regulatory requirements, the Bank's ESSs and international best practices.

2.2 Principles of Stakeholders Engagement

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 stakeholders' feedback, for analysing 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(s) is inclusive. All stakeholders at all times 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, in particular women, youth, elderly including diverse ethnic groups.

2.3 Benefits of Stakeholder Engagement Plan

The following are benefits of pursuing stakeholder engagement:

- **Managing costs:** Effective engagement can help project MoF/ESCOM/EGENCO avoid costs, in terms of finance and time
- **Managing risk:** Engagement helps Project implementers and stakeholders including Project-affected-persons to identify, prevent, and mitigate environmental and social impacts that can threaten project viability.
- **Enhancing reputation:** By publicly recognising human rights and committing to environmental protection and sustainable social development, the MoF/ESCOM/EGENCO and Project financier, the World Bank will maintain and enhance their corporate image and reputation in prevention of environmental and social risks and impacts.
- **Avoiding conflict:** Understanding, managing, and mitigating potential issues such as land rights, community health and safety, Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA) that would be affected by proposed project activities
- **Improving corporate policy:** Obtaining perceptions about a project, which can act as a catalyst for changes and improvements in MoF/ESCOM/EGENCO's corporate practices and policies.

- **Identifying, monitoring, and reporting on impacts:** Understanding a project’s impact on stakeholders, evaluating, and reporting back on mechanisms to address these impacts; and
- **Managing stakeholder expectations:** Consultation also provides the opportunity for MoF/ESCOM/EGENCO to become aware of and manage stakeholder attitudes and expectations.

2.4 Stakeholder Engagement Approach

There are a variety of engagement techniques and communication channels that shall be used to cultivate and build relationships with stakeholders, gather information from stakeholders, consult with stakeholders and disseminate project information to stakeholders.

2.4.1 Communication Techniques

When selecting an appropriate consultation technique, culturally appropriate consultation methods and the purpose for engaging with a stakeholder group shall be considered. The techniques that have and will continue to be used for consultations are as follows:

Table 1: Stakeholder Engagement Techniques

Engagement Technique	Appropriate application of the technique
Correspondences (Phone, Emails)	Distribute information to Government officials, NGOs, Local Government, and organisations/agencies Invite stakeholders to meetings and follow-up
One-on-one meetings	Seeking personal views and opinions Enable stakeholder to speak freely about sensitive issues Build personal relationships Record meetings
Formal meetings	Present the Project information to a particular group of stakeholders Allow groups to comment – opinions and views Build relations with high level stakeholders Disseminate technical information Record discussions
Public meetings	Present Project information to a large group of stakeholders, especially communities Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information

	<p>Facilitate meetings with presentations, PowerPoint, posters etc.</p> <p>Record discussions, comments, questions</p>
Focus group meetings	<p>Present Project information to a group of stakeholders</p> <p>Allow stakeholders to provide their views on targeted baseline information</p> <p>Build relationships with categorically selected communities</p> <p>Record responses</p>
Government/ESCOM/EGENCO websites	<p>Present project information and progress updates</p> <p>ESMF, ESMPs, RAPs, LMPs and other relevant Project documentation.</p>
Direct communication with service providers e.g., Waste management facilities, Health facilities, Rehabilitation works, etc.	<p>Share information on timing of location, clearance, potential impacts, and proposed mitigation measures.</p> <p>Record discussions</p>
Project leaflet	<p>Brief Project information to provide regular update on specific project information in English and Chichewa languages</p>
Seminars/conferences	<p>Share Project information and progress to Government representatives (District Council Officers, interested ministries, parastatals, non-state actors, etc.) as a channel to disseminate information on the project</p> <p>Record discussions</p>
Community Forums	<p>Project-initiated community fora through local community leadership to disseminate project information to community members.</p> <p>Record discussions</p>
Information Boards	<p>Notice boards are effective mechanisms to inform the communities and wider audiences about the project. These can be installed in specific areas of impact (communities, clinics, schools, etc).</p>
Media	<p>Newspapers, community radios, national radios, and televisions</p>

Prior to any engagement event the following actions will occur:

- Preparation of standard 'question and answer' sheets tailored for specific stakeholder types (based on 'lessons learned' analysis and common issues raised in previous engagement);
- Planning/design of engagement action(s) with PM, consultants, and then key 'traditional' and 'formal' authorities.
- Reaching an internal agreement between PIUs and E&S team on the role of local and international consultants during stakeholder events and whether the presence of a MoF staff is appropriate.
- Selection of individual stakeholders with whom engagement will occur.
- Selection of methods for disclosure of information (including such topics as format, language, and timing).
- Selection of location and timing for engagement event(s) (avoiding busy work times, which may be seasonal, and days/times when special events may be occurring e.g., farming, ceremonies, community work etc).
- Agreeing on mechanisms for ensuring stakeholder attendance at engagement event(s) (if required).
- Identification and implementation of feedback mechanisms to be employed

2.4.2 Communication Channels and Disclosure Obligations

As a standard practice, the Project safeguard instruments (ESMF, SEP, RFP etc.) released for disclosure are accompanied by making available for at least a period of one calendar month and the Project Implementation Units (PIUs) keeps a register of comments and suggestions from the public that are subsequently documented in a formal manner.

The PIUs will continue applying a similar approach to disclosure for any new information that becomes available about the Project as well as the additional E&S appraisal materials that will be prepared as part of the Project development.

Distribution of the disclosure materials will be through making them available at venues and locations frequented by the affected community and the public (e.g. Community leader's ground, schools, Government offices, hospitals, health centers, etc.) furthermore, disclosure materials should be made available to broadcasting media for instance community and national radio and televisions to ensure that persons who are unable to read and write and those with physical disabilities who are unable to access certain locations can access the information.

Table 2: Description of Information Disclosure

Communication Channel	Objective	Target Stakeholders
Media (Print and Broadcasting) Posters Brochures Leaflets	<ul style="list-style-type: none"> • Make announcements regarding the Project and engagement activities. • Inform stakeholders of meetings or the availability of Project data. • Inform stakeholders of meetings or the availability of Project information. 	<ul style="list-style-type: none"> • Government • Government parastatals/agencies • Local/traditional communities • Vulnerable/disadvantaged Groups • Non-government organizations (NGOs);
Email	<ul style="list-style-type: none"> • To distribute all project notification material to those parties with access to this facility. • To inform stakeholders of availability of project data including tabling of ESMF reports (Scoping report, draft ESMF report etc.). 	<ul style="list-style-type: none"> • Government departments • Parastatals/agencies • Non-state actors
Face to face meetings: <ul style="list-style-type: none"> • Workshops • Formal meetings • Community meetings • Focus Group Discussions • Seminars/conferences 	<ul style="list-style-type: none"> • To transmit information about the Project and reinforce dialogue. 	<ul style="list-style-type: none"> • All stakeholder groups.

The listed communication channels will ensure that the objectives and impact of the project are communicated to all stakeholders in the easiest and practical way possible. Consequently, wide engagement of key targeted stakeholders will be achieved and all stakeholders will be aware of the project and appreciate its impact both to the members of the communities in particular and the country at large.

2.4.3 Stakeholder Communication Activities

The purpose of the stakeholder communication activities for this project is to consult stakeholders on the proposed project design, anticipated environmental and social risks and impacts, mitigation measures, the draft engagement plan and the draft environmental and social risk management instruments as well as providing regular information and feedback to stakeholders related to project implementation progress and any other emerging issues throughout the project cycle.

Table 3: Stakeholder Communication Activities

No.	Project Phase	Activity	Objective	Targeted Stakeholders	Time Frame
1	Project Preparation Phase	National stakeholder consultations	Collect views on the design of the project, environmental and social risks, mitigation measures, grievance redress mechanisms and Stakeholder engagement and communication plan	Representatives of Government MDAS, Development Partners, and NGOs	May to July 2022
		District level Stakeholder consultations	Collect views on the design of the project, environmental and social risks, mitigation measures, grievance redress mechanisms and Stakeholder engagement and	Members of the District Executive Committees and its Subcommittees	May to July 2022

No.	Project Phase	Activity	Objective	Targeted Stakeholders	Time Frame
			Communication plan		
		Community level Stakeholder consultations	Collect views on the design of the project, environmental and social risks, mitigation measures, grievance redress mechanisms and Stakeholder engagement and Communication plan	Members of ADCs, VDCs, CBOs, Traditional and religious Leaders, Ordinary members of the community including women, youths, the elderly and disabled	May to July 2022
2	Project Implementation Phase	Project inception meetings with District Councils	Provide feedback on approved project design and orient district level stakeholders on their roles, establishment of DGRCs	Members of the District Executive Committees	July to September 2022
		Community mobilization	Mobilize and prepare target communities for project implementation and establish community GRCs	Members of target communities, ADCs, VDCs, traditional, religious and political leaders, development sub-committees such as CBOs, vulnerable and marginalized groups	July to September 2022

No.	Project Phase	Activity	Objective	Targeted Stakeholders	Time Frame
		Project implementation monitoring and supervision missions	Provide and obtain on going information and support on project performance	National, district, and community level stakeholders	Ongoing
		Project review meetings with selected stakeholders from National, District and Community level	Provide and get periodic feedback on project implementation progress and any emerging issues	Selected National, District and Community level stakeholders including GRCs	On going
3	Project Close Out Phase	Project close out meetings	Engage stakeholders on project exit strategy	Beneficiary communities and groups, national and district stakeholders	Project phasing out

2.5 Stakeholder Identification and Analysis

In order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. This information shall then be used to tailor engagement to each type of stakeholder. As part of this process, it will be particularly important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the project because of their marginalized or vulnerable status.

It is also important to understand how each stakeholder may be affected – or perceives they may be affected – so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner.

Stakeholders have been and will continue to be identified on a continuing basis by identifying:

- Various stakeholder categories that may be affected by, or be interested in, the Project; and
- Specific individuals, groups, and organizations within each of these categories considering:

- The expected Project area of impact, that is the geographical area over which it may cause impacts (both positive and negative) over its lifetime, and therefore the localities within which people and businesses could be affected.
- The nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions, and other bodies who may have an interest in these issues.

In general, engagement is directly proportional to impact and influence, and as the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increase, engagement with that stakeholder group shall intensify and deepen in terms of the frequency and the intensity of the engagement method used. All engagement shall proceed based on what are culturally acceptable and appropriate methods for each of the different stakeholder groups targeted.

With reference to ESS10, “stakeholder” refers to individuals or groups who:

- (a) Are affected or likely to be affected by the project (project-affected parties); and
- (b) May have an interest in the project (other interested parties).

For the purpose of the SEP, the term “Project-affected parties” includes “those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities (World Bank, 2018b). They are the individuals or households most likely to observe changes from environmental and social impacts of the project.

The term “Other interested parties” (OIPs) refers to “individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academia, unions, women’s organizations, other civil society organizations, and cultural groups” (World Bank, 2018b).

2.5.1 Project Affected Parties

Table 3 shows the potential role, interest and influence of each of the target audiences captured in the Project in as far as the mandate, history of involvement, resources and authority in development planning and decision making are concerned.

Table 4: Project Affected Parties

Communities			
Stakeholder	Involvement in the Project	Interest	Influence
<ul style="list-style-type: none"> Affected communities (Various districts) 	<ul style="list-style-type: none"> Provide information or their views on the Project which will assist the project team to make informed decisions when implementing the project. Provide support during the implementation of the project in terms of labor and public security Ease of acquiring raw materials for the Project through formal land acquisition and resettlement processes, where necessary Appraise the Project by reporting any non-conformance to Standard Operation Procedures (e.g. labor management, GBV/SEA, community safety and health, among others) 	High	High
<ul style="list-style-type: none"> Community Leaders/ Traditional Authorities 	<ul style="list-style-type: none"> Local community leaders act as representatives of their local community. Meetings with traditional authorities is required in order to introduce the project in the area and request for extraction of raw materials for the Project where necessary. It shows respect in the cultural and social structures of the nation but also enhances buy-in and 	High	High

	<p>ownership of the Project</p> <ul style="list-style-type: none"> • Be involved in and facilitate the resolution of community conflicts and land disputes at community level. • Appraise the Project by reporting any non-conformance to Standard Operation Procedures (e.g. labor management, GBV/SEA/SH, community safety and health, among others) • Liaison Officers will be selected from each village to be a link between the community and the utility Companies (ESCOM and EGENCO), contractor and Supervising Firm. 		
--	---	--	--

2.5.2 Other Interested Parties

Government Ministries outside MoF are also stakeholders that can be considered as other interested parties to the project. Engagement with government will serve two main purposes:

- (i) Involve the ministries, departments and committees in each step of the Project to build consensus and ownership; and
- (ii) Identify the governance framework for socio-economic development and environmental management.

Table 5: Other Interested Parties

Government Ministries, Departments, Agencies, Development Partners and NGOs	Potential Involvement in the project	Interest	Influence
Ministry of Finance	<ul style="list-style-type: none"> Provide oversight and control of disbursement project funds to the implementing agency. Monitor compliance of financial reporting of project funds by the implementing agency. 	Low	High
World Bank (WB)	<ul style="list-style-type: none"> Provide funding for the Project 	High	High
Ministry of Energy and MERA	<ul style="list-style-type: none"> Provide oversight, policies and control over energy issues and standards 	Low	High
Ministry of Lands	<ul style="list-style-type: none"> Provide oversight and assist with policies and local best practices regarding land and resettlement issues. 	Low	Medium
District Councils	<ul style="list-style-type: none"> Facilitate resolution of community conflicts and project related disputes in the Project area Monitor the implementation of the Project 	High	High
Ministry of Gender, Children, Disability and Social Welfare	<ul style="list-style-type: none"> Provide policies and regulations regarding vulnerable people and gender-based violence during the project. 	Medium	High
Local NGOs/ CBOs	<ul style="list-style-type: none"> Providing support during implementation of the project. Influence ideas on the implementation of the project that will improve 	High	High

	livelihoods of the people directly affected by the project <ul style="list-style-type: none"> • Disseminate information and provide guidance to ensure that community members are considered and involved in the project implementation. 		
--	---	--	--

2.5.3 Disadvantaged/Vulnerable Individuals or Groups

Much as the project is largely expected to have positive impact among beneficiary members of the target communities, there is still a possibility of individuals, families and communities that might be negatively affected by activities of the project. These may come from among the beneficiaries or non-beneficiary members of the target communities. The women and children, the youth, elderly, disabled and chronically ill are often times the most vulnerable because of their limited access to information due to physical, social, cultural and structural barriers within the communities. These categories of people will be particularly targeted with adequate information to understand the nature of project activities and anticipated positive and potential negative impacts of the project. They will also be provided with information on how to access the grievance redress mechanism of the project whenever the need arises.

Members of the community that are old might have mobility challenges to access venues for program activities such as meetings. There will be consideration to organize meetings within manageable distances for such people. Another envisaged challenge is high illiteracy levels in some of the target communities that will make it difficult for beneficiaries to read and understand written information pertaining to the project. Appropriate methods such as public meetings, visual media (posters, billboards, community videos), and mobile public address system will be employed to reach out to such groups of people. Hearing challenges (due to age or birth) by some beneficiaries might require use of sign language aides in outreach and visibility tools as well as Public Address systems or megaphones, especially where the meetings attract large crowds of people.

The Project will ensure that inequalities between men and women are addressed and all unintended effects on gender dynamics for example, GBV/SEA/SH are prevented. The program will plan on different levels of education and look into culturally appropriate consultations, representation of different perspectives across social economic, ethnic and religious lines.

The Project will ensure that there is representation and participation of women and other vulnerable groups including people living with disabilities, people living with HIV/AIDS different religious groups, marital status, the youth and children in all community consultations, meetings, and interactions about the Project as these will be equally affected by the Project. The Project

will ensure that venues for meetings are accessible to vulnerable groups and that information is provided in a language that is easy to understand. This work shall be done in collaboration with other NGOs and CBOs working in the area, particularly those working with vulnerable groups such as women, the Youth, the elderly and adolescent girls.

All data collected by the Project will be disaggregated by gender for effective decision making. Hence, for each meeting, the number of men and women, youth and children will be recorded. To ensure that views of different categories of people are captured, special focus group discussions (FGDs) will be held for men only, women only, people with disabilities as well as people living with HIV/AIDS. Special attention will also be paid for the elderly and youth; disaggregating them into male and female.

Representation and participation of women and other vulnerable groups in different committees will be prioritized by the Project with special emphasis given to the women and the youth to influence decisions that affect them and make their voices heard. Where need be, focus group discussions will be organized where women will be given a platform to raise their own issues and concerns in regard to the Project. Issues important to women will be given equal weight hence will be included in meeting agendas and group discussions among others.

Extra effort will be undertaken to reach out to non-beneficiating members of the target communities in order to make them understand the project targeting processes and capacity limits so that they do not feel disadvantaged and also to gain their support for the Project.

2.6 Stakeholder Engagement Activities

All stakeholder engagement activities will be informed by stakeholder identification, analysis and mapping and based on comments received on consultations held. The activities will be based on the various aspects of the project components as outlined in the project description.

Prior to the commencement of stakeholder engagement activities, meetings shall be scheduled in liaison with relevant traditional leaders, community representatives, political leaders (e.g. MP and councilors), Heads of Government departments, representatives from NGOs and CBO, the media, the project affected parties (PAPs) and other interested parties (OIPs). The purpose of these meetings shall be to refine the stakeholder engagement strategy so as to meet the requirements of PAPs and OIPs and ensure that future communication is effective and cognizant of social and cultural sensitivities.

Planned Stakeholder Engagement Activities

A set of stakeholder consultation meetings have been conducted during the months of February, March and April 2022 where ESCOM and EGENCO engaged groups of stakeholders to get their views on the Project.

Table 6: Stakeholder Engagements

DATE	STAKEHOLDER	AGENDA	FEEDBACK
February 2022	World Bank Mission	Assessment mission, site visits	Discussions on funding Discussions on scope and Work plans
February 8-16, 2022	MEPA	Guidance on screening of the Project and ToRs	ToRs for ESMP development study provided
January to February 2022	ESCOM internal stakeholders (Transmission, Distribution, Projects, EM)	Extent of the effects of the cyclone, scope of works, workplans	Scope of works and Workplans
January - March 2022	Govt/Political leaders (MPs, Ministries of Energy, Finance, Local Government, Natural Resources, Water, Agriculture)	Familiarization on project impact and risks Input in Project development Source of Project financing	Insight on dam safety measures Assist in sourcing Project financiers
January – March 2022	Govt Ministry of Energy and Ministry of Finance, Political leaders (MPs, Ministries of Energy, Finance, Local Government,	Familiarization on cyclone impact and risks. Input in Project development Source of Project financing	Assist in sourcing Project financing

February 2022	Media	Media site tour and coverage during high level visits	Wide coverage of project stories in the media
February 2022	Private sector and electricity users	National and regional meetings on issues of electricity provision	Potential collaborations and support
February to March 2022	Community level stakeholder engagement	Support for smooth project implementation	Greater buy in and support
February 11, 2022	EGENCO staff	Appraising the recovery plan Assurance of their employment tenure	Provided views on the Project
March 1, 2022 and ongoing	Local leaders (T/A Kasisi, GVH Kandeu	Impacts and benefits of the Project Acquisition sites of materials e.g. gravel, clay, rock aggregates	Assurance on availability of materials Follow proper land acquisition process Offer employment to locals
March 1, 2022, and ongoing	Project-affected persons	Impacts and benefits of the Project Acquisition sites of materials e.g. gravel, clay, rock aggregates	Offer employment to locals Mitigate dust and vehicle speed Follow proper land acquisition process
March 2 and March 8-21, 2022	Department of Geological Survey	Guidance on rock aggregates and locations	Locating rock aggregate reserves Sampling and recommending rock outcrop sites

March 6, 2022, and ongoing	Chikwawa District Council	Impacts and benefits of the Project Acquisition sites of materials e.g. gravel, clay, rock aggregates	Assurance on availability of materials Follow proper land acquisition process Offer employment to locals Adhere to Project operational standards (ESMP, OHS, GBV etc)
March 8- April 12, 2022	Majete Wildlife Reserve	Appraising the recovery concept for phase 1 ESMP preparation Kickoff meeting for phase 1 works	Provided their views on the Project
March 30, to April 2, 2022	Department of Mines	Process on rock aggregate mining and licensing	Provision of due processes and required studies (e.g. ESIA/ESMP)

Consultations will continue to take place throughout the project cycle. The SEP will be updated as and when more details of the project activities get firmed up to reflect specific consultations that will be conducted during project implementation. It will also be updated to reflect the target groups who will be consulted at each project stage, the specific topic on which their feedback will be sought, and the method used to communicate with them, and the timeframe in which this will be done and responsible person/agency for organizing the consultation.

2.7 Monitoring and Reporting of Stakeholder Engagement Plan

The Stakeholder Engagement Plan will be periodically revised and updated as necessary in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the project. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP which will subsequently be re-disclosed.

2.7.1 Reporting

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collected by responsible staff in the PIUs and referred to the Project Manager. The monthly

summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

2.7.2 Monitoring:

A number of stakeholder engagement activities will be monitored by the Project on a regular basis, including the following:

- Materials disseminated: types, frequency, and location.
- Place and time of formal engagement events and level of participation including specific stakeholder groups (e.g., women, youth, community leaders).
 - Geographical coverage of public engagement activities.
 - Numbers and type of stakeholders who come into contact with the Project team by mail, telephone and any other means of communication.
 - Meeting minutes, attendance registers and photographic evidence.
 - Feedback and Comments received by government authorities, community leaders and other parties and passed to the Project. The extent to which feedback and comments have been addressed and have led to corrective actions being implemented.
 - Number of public grievances received within a reporting period (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline.
 - Type of public grievances received.
 - Number of press materials published/broadcasted in the local, regional, and national media.

The key performance indicators to assess the quality of the SEP implementation will be finalized and agreed on by the implementing agency and reflected in the Project Operational Manual (POM). An independent M&E team may be deployed to assist with the overall monitoring of the SEP, particularly to assess the implementation of stakeholder engagement.

3. PROPOSED STRATEGY FOR INFORMATION DISCLOSURE

Appropriate information will be provided to stakeholders depending on the stage of the project and the identified stakeholder information needs. This will include information on the nature of the project design, the anticipated environmental and social risks and impacts, the proposed mitigation measures, the stakeholder engagement plan, grievance redress mechanisms and how stakeholder views were incorporated in the project design and management of environmental and social risks.

The Project will use a combination of methods to disclose information pertaining to the project in a manner that is commensurate with the nature of the identified stakeholders and environmental and social sensitivity of the project. For community level stakeholders, information will mostly be disclosed through public meetings organized within the communities. Deliberate efforts will be made to ensure that vulnerable groups of people such as women and children, the elderly and disabled are adequately represented and heard in such meetings. At national and district level, disclosure of information will be done through meetings with the representatives and members of relevant MDAs, committees and sub-committees. Printed and electronic copies of relevant project documents will be made available to stakeholders through appropriately designated places within reach of stakeholders.

Communication to stakeholders on information disclosure for the Project will be conveyed through relevant means depending on targeted audiences. Mostly, the project will use written forms of communication such as letters and electronic mails, community radio stations where available, and mobile public address system. Where possible social media platforms and groups will be created to assist in information dissemination to targeted stakeholders. All these processes, platforms, and channels will be linked to the ESCOM website.

Table 7 summarizes the key methods that will be used for disclosure of Project information at different stages of the Project.

Table 7: Methods for Disclosure of Project Information

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Percentage reached	Responsibilities
Project Preparation	Project Design summary, Stakeholder Engagement Plan, Environmental and Social Commitment Plan, Grievance Redress Mechanism setup	Community Meetings, Events, and gatherings	Selected communities, May to July 2022 and After Bank Approval	Members of target communities in target districts	About 40% of target audience	PIU in Collaboration with District Councils
		Community and National Radio stations Billboards, banners, leaflets,	After Bank Approval	Community members in target districts	60% of target audience	PIU
		Make available printed and electronic copies of the material at National, and District level focal offices as on the Website	July to September 2022 and After Bank Approval	National and District level stake holders	95 % of target stakeholders	PIU
Project implementation	Project Progress Reports	Review Meetings Community radios, national radios, billboards, banners, newspaper placements, flyers and brochures etc	Ongoing	Stakeholder representative at national, district and community level	100 % of target stakeholders	PIU

3.1 Proposed Strategy for Consultation

The Project will mostly employ interviews, focus group discussions, open meetings, and workshops as a means of carrying out consultations. These will be done right in the target districts and communities to enable easy participation of vulnerable and disadvantaged groups of people.

Table 8: summarizes the key consultations that will be undertaken.

Table 8: Summary of Key Consultations and Methods to be used

Project stage	Topic of consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibilities
Project Preparation	Project design elements	Workshop with target stakeholders	Blantyre May to July 2022	Representatives of Government MDAS, Development Partners, and NGOs	MoF/PIUs
	Project design, Environmental and Social Risks, Mitigation Measures, GRM and Stakeholder Engagement Plan	Meetings with District Social Support Committees and District Environmental Sub-Committees	Chikwawa and Blantyre District Councils May to July 2022	Members of District Councils,	PIUs
	Project design, Environmental and Social Risks, Mitigation Measures, GRM and Stakeholder Engagement Plan	Community Meetings and focus group discussions	Targeted communities in project Districts Councils May – July 2022	Representative Members of ADC, VDC, CBOs, GRCs, vulnerable groups, religious leaders, political leaders,	PIUs
Project Implementation	Project implementation Progress Review meetings	Community Meetings	Project target communities, Ongoing throughout project life span	Representative Members of ADC, VDC, CBOs, GRCs, vulnerable groups, religious leaders,	PIUs

				political leaders,	
Project phase out	Exit strategy preparation	Community Meetings	Project target communities, Final year of the project	Representative Members of District council, ADC, VDC, GRMCs, vulnerable groups, beneficiaries, religious leaders, political leaders,	District councils with support of the Project Implementation Units

3.2 Social and Gender Inclusion

Appropriate and clear methods of communication will be used to inform in a timely manner, all participants about the meetings. This will include invitation letters where possible, stipulating the type and number of community stakeholder groups expected to come to the meetings. The community meetings will be properly facilitated using a pre-designed discussion guide which will carry specific questions targeting vulnerable groups. Well experienced moderators will be used to conduct community meetings to ensure equitable participation and contribution of marginalized groups. All data collected by the MEPRP will be disaggregated by gender for effective decision making. Hence, for each meeting, the number of men and women, youth and children will be recorded. To ensure that views of different categories of people are captured, special focus group discussions (FGDs) will be held for men only, women only, people with disabilities as well as people living with HIV/AIDS. Special attention will also be paid FGDs for the elderly and youth, disaggregating them into male and female.

The facilitating teams will have skilled note takers who will record the deliberations verbatim with the aid of voice recorders. Consent (verbal) or and otherwise, will be sought from meeting participants before recorders are used in recording of proceedings. After completion of

consultations, the field notes and transcriptions will be consolidated, analysed and key issues incorporated into the relevant project documents.

The project will promote gender and social inclusion throughout its implementation to ensure the inclusion of the disadvantaged and the vulnerable. Views of women and other vulnerable groups on the Project will be considered to have a holistic picture of potential risks and impacts the Project may pose and come up with effective mitigation measures considering that men and women view things differently. The Project will ensure that inequalities between men and women are addressed and all unintended effects on gender dynamics for example, domestic violence are prevented.

The MEPRP will ensure there is representation and participation of women and other vulnerable groups including people living with disabilities, people living with HIV/AIDS, the youth and children in all community consultations, meetings, and interactions about the project as these will be equally affected by the project. The MEPRP will ensure that venues for meetings will be accessible to vulnerable groups and that information is provided in a language that is easy to understand.

Representation and participation of women and other vulnerable groups in different committees will be prioritized by the Project with special emphasis given to the women to influence decisions that affect them and make their voices heard.

MEPRP will have a Gender Based Service Provider (GBV SP). The GBV SP will disseminate information and raise awareness on issues of GBV/SEA/ SH and child protection in the impact area. The Project will also work with the One-Stop Centre if available where GBV survivors will have access to support services from service providers like the hospital, police, magistrate court and social welfare among others in one place.

3.3 Review of Comments

Upon disclosure of project information, provision will be made for feedback channels where the public and concerned stakeholders may submit their comments, observations and questions regarding the project. Considering the moderate degree of environmental and social risks that are anticipated in this project, these will mostly constitute lockable boxes where written comments regarding the project will be deposited. For information disclosed through meetings,

instant feedback will be collected through designated rapporteurs who will be available during the meetings. Participating stakeholders will also be given freedom to take their own minutes of the proceedings and share a copy with the rapporteurs. Comment boxes will also be placed in designated places within the communities for use by community members to submit views and reactions after information disclosure meetings. After the deadline for submission is passed comment boxes will be collected from the sites for consolidation, analysis and inclusion into the project documents. A summary of how comments were taken into account will be made and shared with the stakeholders through project implementation inception meetings once the final decision on the project is made by the Bank.

3.4 Future Phases of Project

This stakeholder engagement plan has established a continuous stakeholder engagement program for the project to ensure that stakeholders are kept informed throughout the project phases. The stakeholder engagement program includes annual project review meetings, quarterly community interface meetings, and regular project monitoring and supervision visits. These platforms will provide avenues for exchange of information between project implementers and other stakeholders regarding the progress of the project and issues related to management of environmental and social risks including the grievance redress mechanism.

3.5 Communication Plan

The communication plan takes into account the stakeholders analysis and mapping results with aim of communicating messages based on the stakeholders interest in the project and also their access to information with the aim of supporting to achieve the objectives of the project. The communication goals are outlines below:

Communication goals

- 1.** Build awareness and knowledge of the MEPRP.
- 2.** Encourage dialogue and create a two-way information flow.
- 3.** Keep key stakeholders informed on a regularly and timely basis.
- 4.** Influence behavior through capacity building and understanding.

3.6.1 Communication Principles

The fundamental driving force for all communication under the MEPRP is expressed in the principles in Table 9. These are essential for ensuring that the objective of the project and the communication goals are achieved in an accountable and effective way.

Table 9: Communication Principles

Integrity	<ul style="list-style-type: none"> • We share information in an open, transparent and accountable way; • We provide the necessary and promised communication tools; • We do what we say we do
Dialogue and responsiveness	<ul style="list-style-type: none"> • We attach great importance to a positive two-way dialogue; • We listen actively to all stakeholders and value their opinions; • We offer easy, accessible opportunities to provide feedback, especially for target audiences directly affected by the MEPRP
Clarity	<ul style="list-style-type: none"> • We communicate in a clear and concise manner; • We communicate in a language and style that is easy to understand
Audience adaption	<ul style="list-style-type: none"> • We gain insight into the needs and perceptions of target audiences; • We tailor communication to meet the needs of target audiences; • We share information in a format that is easy and accessible for all target audiences
Respect	<ul style="list-style-type: none"> • We respect and support human rights; • We treat every person with dignity and courtesy; • We embrace diversity and fair treatment for all

3.6.2 Key Messages

For communication to be effective, it must focus on being consistent, trustworthy and on delivering a few key messages that are repeated across different communication materials. The key messages need to be clear, short, benefit-oriented and written in a language and style that target audiences can understand and relate to.

The brand message for the MEPRP is: “**Build Back Better and Resilient Energy Sector**”. It is defined based on the Project Development Objective (PDO) of the MEPRP and is linked to both components of the project. Key messages will be developed for each component with the aim of supporting the brand message and will be outlined in each utilities communication plan in line with the differentiated stakeholder mapping and analysis. Both the brand messages and the key messages will be translated into Chichewa. The intention is to use the brand message and key messages in communication materials promoting the MEPRP. Under each key message why, how, what, who and when will be addressed and explained.

Table 10: Communication Activities and Media Channels

Printed media/publications	Digital media	Events/face to face communication
<ul style="list-style-type: none"> • Newspaper articles • Single sheet case stories • Policy briefs • Fact sheets/case studies • Fast facts sheets • Infographics sheets • Leaflets and fliers • Posters, banners, and roll ups • Training and learning materials • Visibility-tshirts, caps, chitenjes etc. • Billboards • Newspapers • Magazines and newsletters • Press releases 	<ul style="list-style-type: none"> • Website • Social media- Facebook, Twitter, YouTube • e-newsletters • Radio broadcasts • Television broadcasts • Video documentary • PowerPoint presentation • SMSes • blogposts 	<ul style="list-style-type: none"> • Focus groups • Interviews • Meetings • Trainings • Seminars and workshops • Information Office • Field visits and study tours • Press briefings • Exhibitions •

Community Specific Communication Activities and Media Channels

- Community meetings
- Radio broadcasts
- Customized trainings and workshops
- Focus group discussions

3.6.3 Generic Stakeholder Engagement Action Plan

This SEP strategy has identified various stakeholders. The plan provides a guide to how MEPRP plans to engage and communicate with each stakeholder group. The broad groups of stakeholders are as follows:

- Communities;
- Local government and district level stakeholders;
- Central government – Task force, Project Technical Committee, Project Steering
- Parliamentary Committees, Ministers;
- Private sector;
- Development partners;
- Academia; and

- Media.

TABLE 11: GENERIC STAKEHOLDER ENGAGEMENT ACTION PLAN

STAKEHOLDER GROUP	ENGAGEMENT ACTIVITY	TIMING
Community	Community meetings	Continuous
	Consultations	Continuous
	Focus group discussion	As required
	Surveys	As required
	Radio broadcasts	Continuous
Local government and district level stakeholders	Consultative Committee meetings	Quarterly
	District Council briefings	Bi-annually
	District Executive Committee (DEC) meetings	As required
Central government	Task force meeting	Regularly
	Project Technical Committee meetings	As needed
	Project Steering Committee meetings	Quarterly
	Members of Parliament briefings	As needed
	Cabinet briefing	Annually
Private sector	Business fora	Quarterly
	Workshops	When they happen
Development partners	Missions	Bi-annually
	Reports	Monthly/Quarterly
	Newsletter	Quarterly
Academia	Newsletters	Quarterly
	Conferences/workshops	Annually
Media	Press releases	As needed
	Media briefings	As needed

4. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 Resources

The Project has allocated an indicative amount of funds amounting to US\$1.5 Million (approximately MK1,510,000,000) to facilitate citizen engagement activities including stakeholder engagement and grievance redress mechanism for the entire project period of two years. Table 12 provides estimated budget for key stake holder engagement activities.

Table 12: Budget Estimate for Stakeholder Engagement Activities

No.	Project Phase	Engagement Activity	Objective	Targeted Stakeholders	ESCOM Budget (MK)	EGENCO Budget (MK)
1	Project Implementation Phase	Project inception meetings with District Councils	Provide feedback on approved project design and orient district level stakeholders on their roles	Members of the District Executive Committees	20,000,000	20,000,000
		Community mobilization	Mobilize and prepare target communities for project implementation	Members of target communities, ADCs, VDCs, traditional, religious and political leaders, development sub-committees and marginalized groups	50,000,000	30,000,000
		Roll out and Manage the Grievance Redress Mechanism	Provide a systematic way of receiving, recording and resolving grievances from Project Affected Persons (PAPs)	Project Affected People at community, District and National levels	300,000,000	200,000,000
		Project implementation monitoring and supervision missions	Provide and obtain on going information and support on project performance	National, district, and community level stakeholders	100,000,000	80,000,000

No.	Project Phase	Engagement Activity	Objective	Targeted Stakeholders	ESCOM Budget (MK)	EGENCO Budget (MK)
		Project review meetings with selected stakeholders from National, District and Community level	Provide and get periodic feedback on project implementation progress and any emerging issues	Selected District and Community stakeholders National, and level	60,000,000	40,000,000
2	Project Close Out Phase	Project close out meetings	Engage stakeholders on project exit strategy	Beneficiary communities and groups, national and district stakeholders	30,000,000	30,000,000
3	Project Implementation Phase	Communication and Information – visibility and communication	Engage beneficiaries and implementers and document progress. Disseminate to achieve visibility through systematic outreach activities	Communities, district and national level stakeholders	300,000,000	250,000,000

4.2 Management Functions and Responsibilities

The Stakeholder Engagement activities will form part of the Environmental and Social Commitment Plan (ESCP). This is a tool which will commit Management to ensuring that planned

activities are implemented and form part of project approval documents which will be monitored by the World Bank. The monitoring and evaluation framework for the project will also have indicators on the ESCP whose implementation progress will be tracked and reported accordingly. ESCP Implementation progress report will be periodically produced and shared with stakeholders for review, deliberation and action.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within PIU. The composition and role of PIU and training requirement will be:

EGENCO's PIU Composition and Role: The PIU will have 14 members under the oversight of the Project Manager reporting to Director of Projects and Planning who is the head of EGENCO's Business Continuity Control Centre. Other members of the PIU shall comprise of Procurement Specialist, Chief Risk Management Officer, Civil Engineers (2), Mechanical Engineer, Electrical Engineer, Legal Officer, Social Safeguards Specialist, Environmental Safeguards Specialist, Occupational Health and Safety Safeguards Specialist, Financial Specialist, Communications and Public Relations Specialist and, Monitoring and Evaluation Officer. The PIU will be responsible for the preparation, implementation, monitoring and reporting of the Project activities to line departments as well as Project interested parties.

ESCOM'S PIU Composition and Role: The unit will be under the oversight of the Senior Projects Manager reporting to Director of Projects and Planning, a representative of ESCOM's Executive Management. PIU membership shall comprise Project Manager, Deputy Project Managers (Transmission & Distribution), Procurement Specialists, Financial Specialists, Monitoring & Evaluation Officer, Environmental Safeguards Specialist, Social Safeguards Specialist, Occupation Health & Safety Officer, Wayleave Coordinator, Safeguards Coordinator & Gender Specialist and Clerks of Works. The PIU will be responsible for the preparation, implementation, monitoring, and reporting of the Project activities to line departments as well as Project interested parties.

EGENCO's PIU Training Requirements: The PIU staff will be equipped with training in areas of Procurement Management of Equipment and Works; Records Management; Contract Management; Financial Management; Dam Safety, Operation and Maintenance; Stakeholder Management and Mapping in order to acquaint each member about the critical processes and procedures as well as appraise them on their responsibilities and project management.

ESCOM's PIU Training Requirements: The PIU staff will be equipped with training in their various areas of specialty to acquaint them about the critical processes and procedures as well as appraise them on their responsibilities and project management.

5.0 GRIEVANCE REDRESS MECHANISM

In compliance with the World Bank's ESS 10, a Project-specific Grievance Redress Mechanism (GRM) is being set up by the PIU to handle concerns, complaints, feedback, suggestions, and questions raised by Project-affected-persons and all stakeholders. It will specifically address complaints related to the environmental and social performance of the Project in a timely manner. In the case of labor related grievances, those will be addressed in accordance with the Labor Management Procedure (LMP), which requires a specific GRM (Project workers GRM) to be set up by contractors to handle labor related complaints. The PIU is responsible for ensuring the Project workers GRM is functional and consistent with ESS 2 of the World Bank's ESF and should also have established communication channels with the GRM's set up by the contractors, so as to provide recourse to workers who may not have their grievances and/or feedback addressed by the contractor.

5.1 IMPLEMENTATION ARRANGEMENTS FOR THE GRM

5.1.1 THE IMPLEMENTATION STRUCTURE AND HIERARCHY

There will be three levels in the grievance management procedure. The first level being the Community Grievance Redress Committee (CGRC), then the District Grievance Redress Committee (DGRC) and the last one will be the National Grievance Redress Committee (NGRC) after which external remedies will be sought if the complainant is still not satisfied. There will also be a Workers Grievance Redress Committee (WGRC) which shall be responsible for all employment related grievances between the various Contractors and their Workers.

Figure 1 depicts the processes to be undertaken and the institutional arrangements in place from intake to exiting grievances.

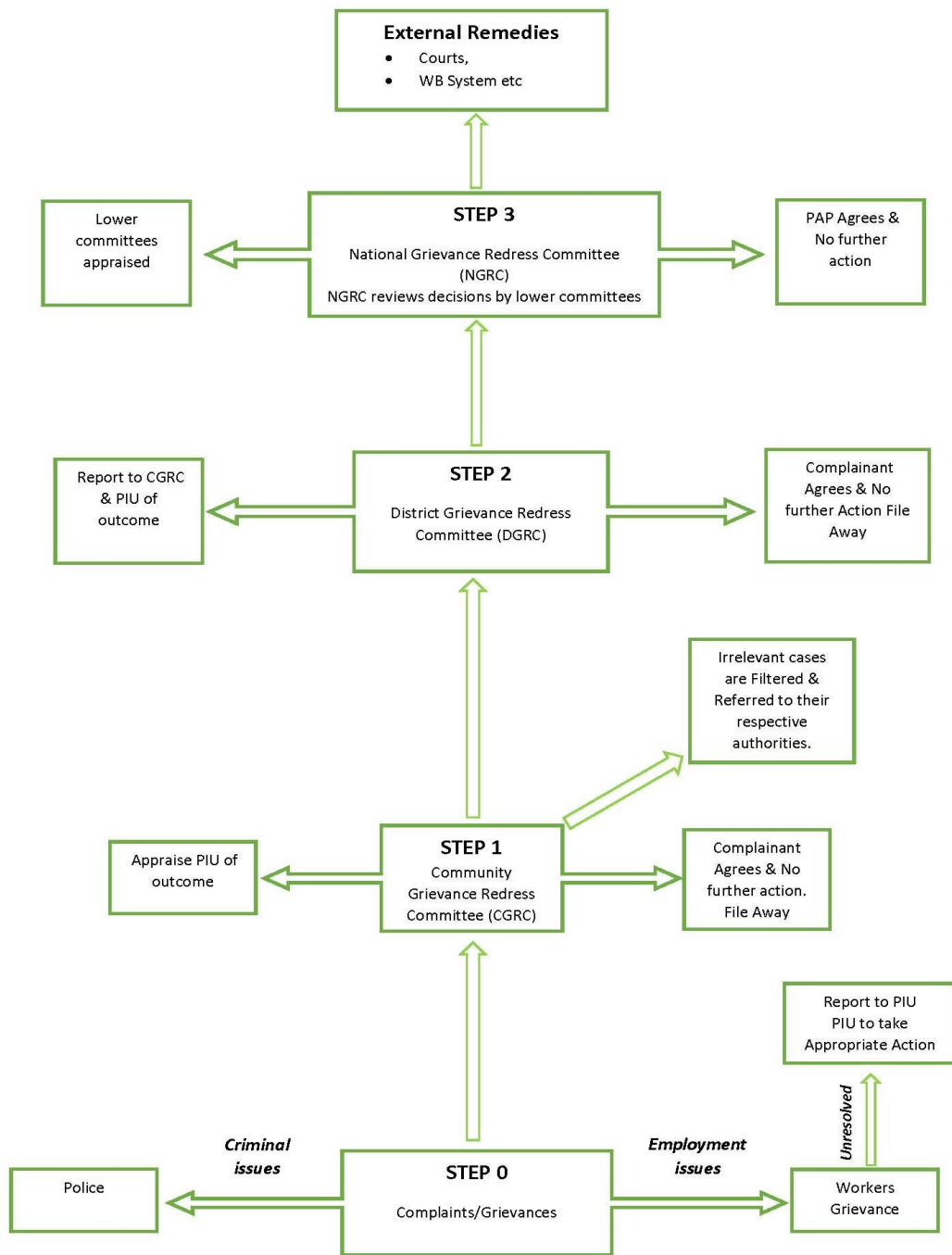


Figure 1. The Grievance Management Process

5.2 THE GRM PROCESS

5.2.1 GRM STAGES

The best solutions to conflicts are generally achieved through localised mechanisms that consider specific issues as well as cultural context, local customs and the project conditions. This GRM will adopt a cascade model in which grievances will be managed successively, through grievances redress committees. The committees are Community Grievance Redress Committee (CGRC), District Grievance Redress Committee (DGRC) and National Project Grievance Redress Committee (NPGRC). A notion of multiple-entry points for a grievance is encouraged in this GRM. For example, a grievance can be lodged at CGRC, DGRC or NPGRC depending on where or at which committee level the grievance has emerged. There will also be external remedies through the formal courts or other legally accepted preferred options. The National committee shall be the top most and last internal tribunal in handling grievances. The public shall be well sensitized of the existence of these structures throughout the Project period. The process will ensure that most of the grievances are addressed at community level in order to ensure expediency when addressing grievances. However, for every Project workplace where implementation shall be taking place, there shall be an additional committee known as the Workers Grievance Redress Management Committee (WGRMC). This particular committee will manage all issues raised by the workers in the course of their work and it will report directly to the PIU where grievances have not been settled.

The detailed procedure of grievance management shall be as follows:

Stage 1: The affected person will file the grievance in writing or verbally to the CGRC and they will be directed and assisted to complete a grievance log and resolution form (Annex 2). Where the complainant cannot write, a responsible member of the CGRC will assist in completing the grievance form. The grievance form should be signed and dated by the aggrieved person. A copy of this completed form shall be submitted to the PIU. The PIU shall ensure that adequate copies of the grievance registration forms are available with the CGRC.

The CGRC at this level shall record, assess and hear cases as submitted to them by the complainant. The issue will then be resolved and feedback provided accordingly. If the complainant is satisfied with the resolution, the issue will be closed. In the event that the case has not been resolved within 14 days, the grievances shall be referred to the District Grievance Redress Committee. The Complainant shall be communicated that his/her issue was referred to the upper committee for hearing. During assessment, when it is noted that the grievance is criminal in nature like sexual exploitation, the complainant will be encouraged to report the issue to the nearest Police Station or to the GBV Champions for onward reporting to the Independent GBV Service Provider. If the grievance is within the

ambit of other external institutions, for example the PIU, Chiefs, District Council or other Government Departments, the CGRC will refer the grievance accordingly and provide feedback to the aggrieved party within 14 days. The CGRC members will be trained and empowered with resources to ensure that most of the grievances are addressed at the community level.

Stage 2: Upon receiving the issue from the CGRC, the District Grievance Redress Committee shall record the case and proceed to conduct due diligence and carry out any other investigations required in assisting to resolve the grievance. The DGRC will assess, resolve and provide feedback to the complainant. If the matter is not resolved and upon expiry of 14 days, or the resolution is provided at this level is still unsatisfactory, the DGRC will refer the issue to the National Grievance Redress Committee (NGRC).

Stage 3: In the event that the case was not closed at DGRC, the case will be referred to the National Grievance Redress Committee (NGRC). The NGRC shall make arrangements to invite the affected person to hear the case and also review the decisions made by the two lower committees. If the complainant shall accept the resolution made, the case shall therefore be closed at this level. In the event that the complainant is still not satisfied at this level, then recourse can be sought from the courts accordingly.

5.2.2 GRM APPROACH AND STEPS

This Section describes steps that can be followed to ensure efficiency and effectiveness of the GRM. Figure 2 summarises the GRM structure and hierarchy.

Step 1: Contact and Dialogue between the complainant and the ‘accused/respondent’. Where applicable and possible, the first step in the GRM should be contact and dialogue to reach an amicable position before it is formally lodged with a GRC. For example, an aggrieved worker and a contractor can enter into a dialogue to find an amicable solution. Or project affected persons can first approach concerned implementing agency (‘accused office) to try and reach a negotiated position or for guidance on the matter at hand. A third party (e.g. local leaders) can be engaged to mediate the process. Regardless of the outcome, the issue can be reported to relevant committee for record purposes.

Step 2: Lodge a complaint. The PAP should formally lodge a complaint with the relevant Grievances Redress Committee. For example, if the issue concerns a number of villagers in a village, the complaint should be lodged with Community Redress Committee.

Where the complaint is against a District Council, for example, the grievances can be lodged with the National Project Grievances Redress Committee.

At each level of Grievances Redress Committee, there will be a Grievance Log and Resolution Form to record the complaint. Each grievance will be assigned a number. Secretary of the Committee will complete the Form or will help the complainant to fill in the Form. Both the Secretary and the Complainant and their witnesses (one for the Committee and one for the Complainant) will sign the Form (Complaint section of the Form) to confirm that what has been recorded is true reflection of the grievance as reported by the Complainant. A copy of the Form shall be forwarded to the project Implementation Unit for record purposes.

Step 3: Assessment, Response and Closure. Within 14 days of receiving a complaint, the Grievance Redress Committee will meet to consider the grievance and provide a response to the complainant. The Committee shall assess whether the complaint or grievance is related to Project activity project or not. For non- Project related grievances, the Committee will advise appropriate institutions with which to lodge the complaint. For Project complaints or grievances, the Committee shall first of all make necessary follow ups to establish the truth of the matter and to confirm that the complaint is indeed genuine. The outcome of the analysis shall be communicated to the Complainant.

The Committee shall be required to complete Resolution section of the Grievance Log and Resolution Form to provide clear decision that has been arrived at in respect to the complaint. A copy of the Form shall be forwarded to the Project Implementation Unit for record purposes.

Where the grievance involves two parties (e.g. a project contractor and a worker or a community or in case of corruption allegations), a Hearing can be arranged as a matter of natural justice to accord both parties to present their side of the story. The outcome of the analysis of the Hearing by the Committee shall be communicated in writing to both parties (the Complainant and the 'Accused').

Closure. Within 7 days of receiving response from the Grievance Redress Committee, the complainant, shall be required to sign the Closure section of the Grievance Log and Resolution Form to confirm that the response is satisfactory and that the grievance is resolved and closed. Where the grievance involves two parties (e.g. a project contractor and a worker or a community or in case of corruption allegations), both the Complainant and the 'Accused', shall be required to sign the Closure section of the Grievance Log and Resolution Form. A copy of the form shall be forwarded to the Project Implementation Unit for record purposes. An electronic database will be established for this purpose.

Step 4: Appeal. Within 7 days of receiving response from the Grievance Redress Committee, the Complainant or the ‘Accused/Respondent’, shall be required to sign the Appeals section of the Grievance Log and Resolution Form to confirm intention to appeal to the next higher Grievances Redress Committee. The Committee retains a copy while another copy is given to the complainant to present to the appeal Committee (the next higher Committee). A copy of the Form shall be forwarded to the Project Implementation Unit for record purposes.

The higher Committee to which the grievance has been referred shall handle the grievance as explained in Step 3 above (Step 3: Assessment, Analysis and Response)

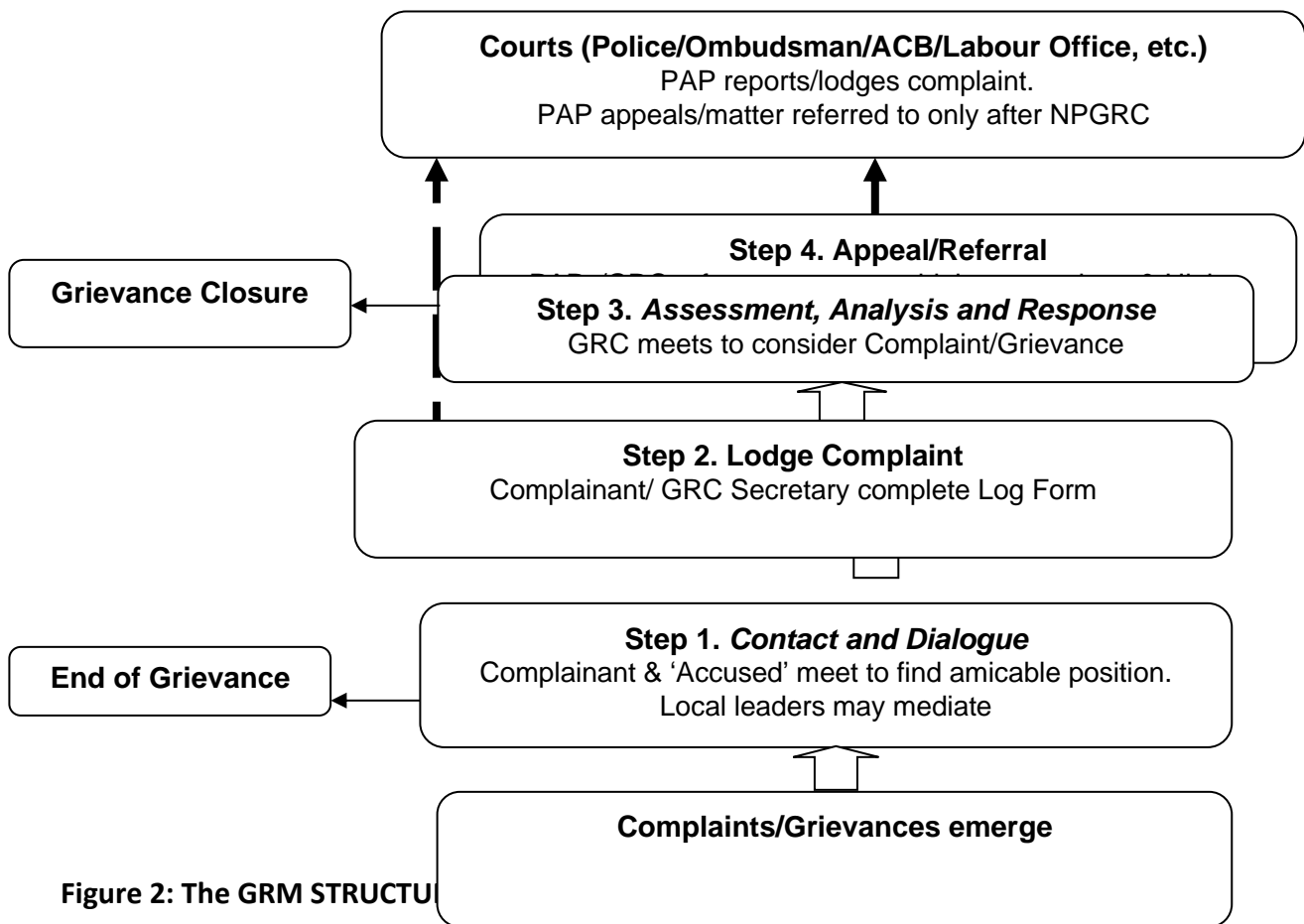


Figure 2: The GRM STRUCTURE

In the case of a complaint, the complainant always retains the right to take the matter to the appropriate legal or judicial authority as per the laws of Malawi at any point in time. This is in cases where the aggrieved person feels that s/he is not being assisted appropriately.

Scope of the Project GRM: Stakeholders and other interested parties may raise questions, comments, suggestions and/or complaints, or provide any feedback on all activities related to

the Project. The complaints or suggestions may be in relation to a number of factors relating to the environmental and social impacts and/opportunities presented by the project. The GRM will be put into place before starting any project activities. It will be proportionate to the potential risks and impacts of the Project and will be accessible and inclusive.

Process of Receiving and Resolving Complaints: In the case of resolution of complaints, the grievance redress mechanism will be in addition to the normal village-level processes that are available to community members, however, it is the primary and sole mechanism through which all Project-related grievances must be managed. Dedicated communication materials will be developed to help local residents become familiar with the grievance redress channels and procedures. ESCOM's website will also include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder.

How to file a complaint: The PIU will provide the channels where Project-affected-persons can make a complaint by phone, email, letter or in person to the PIU members and/or other structures assigned to work on the GRM. Complaints from the GRM's set up by contractor(s), if not addressed and resolved at that level will also feed into the overall PIU GRM.

Receiving and recording complaints: On receiving a complaint, the responsible PIU staff will acknowledge receipt to complainant and record the complaint within 1 business days. The person receiving complaints will fill out the complaint form (example of a complaint form provided in Annex I). In cases where the complainant prefers to remain anonymous, acknowledgment is not required, and the complaint will be recorded and automatically referred to the head of the PIU who will determine how to proceed with the assistance of the PIU. The manner of how anonymous complaints are resolved is reported in the public progress implementation report in order to demonstrate that the grievance has been heard and treated despite the fact that it was anonymous. Upon registration of non-anonymous complaints, the GRM staff will investigate the issue themselves or refer the issue for resolution or mediation to the other three structures described above.

Confidentiality and conflict of interest: Complaints can be made anonymously. Confidentiality is a fundamental aspect of the project and ensuring confidentiality, accountability and anonymity is particularly critical in the case of GBV/SEA/SH complaints. The Project Director must ensure there is no conflict of interest in the case of staff involved in investigating and resolving particular disputes. With respect to GBV type complaints, a specific approach to dealing with such complaints must be developed in line with the WB GBV Good Practice Note before the GRM is operational which is before any project activities begin.

All Grievances regarding GBV/SEA/SH shall be handled through the GBV Service provider. All stakeholders shall be informed of the pathway that has been developed to efficiently deal with

any GBV issues. Stakeholders shall be informed of the availability of One Stop Centres where available in the project areas where survivors will get all the required assistance under one roof. Stakeholders can also access the Bank's corporate Grievance Redress Service (<http://www.worldbank.org/GRS>; e-mail: grievances@worldbank.org) for addressing concerns and grievances arising in connection with the project.

The aim is to resolve all grievances within four weeks. Any grievance which is not resolved within that timeframe will be reported in detail in monthly Project Unit report and flagged in quarterly reports to the World Bank. All grievances will be aggregated to track trends for managerial response and also be included in quarterly reports to the World Bank.

Review complaints or/and questions: Complaints must be followed up on in 10 (ten) working days with the objective of resolving all grievances within four weeks. The person who is in charge of investigating complaints will gather the facts to understand the nature of the complaint, determine if it is project related, establish its legitimacy and seek to identify possible resolution strategies.

Investigation/follow-up can include site visits, document review, and meetings with parties who can solve the problem. The results of the investigation and response will be submitted for consideration to the Project Director, who will decide what action to take. After a decision is made and the complainant receives the information, the responsible staff will explain the action to be taken in the complaint form as well as details of the investigation and findings and submit a response to the Project Director for signing.

Response to complaints: The complainant will receive notification of receipt of complaint by mail or e-mail. Responses are made in answer to a question based on the materials of the investigation and, if appropriate, must refer to national law. The deadline of investigating complaints can be extended to 10-30 business days by the Project Director approval, and the complainant must be informed whether:

- a) Additional consultation is needed to respond to a complaint; and
- b) Complaints need to be answered by complex information and need to learn additional materials to respond.

If the matter remains unresolved, or complainant is not satisfied with the outcome at the project level, the head of the GRM, will then refer to matter to the MOH for a resolution. PAPs have the option to take his/her case directly to the established legal system as provided by Malawian law.

Awareness raising: Information about the GRM will be provided in an accessible format. It will be made available on the website and will be included in communication with stakeholders.

Staff roles and responsibilities: The Project Director will assign roles and responsibilities to PIU staff and GRM staff. This will be documented in the Project Operation Manual and will be updated regularly. It will include:

- Management of the entire GRM system
- Develop and maintain the improvement of awareness
- Collecting the complaints
- Recording the complaints
- Notification to complainants about receipts and deadlines for reviewing complaints
- Sorting / categorizing complaints
- Observing the entire problems, including the causal relationship between project activities and suspected damage/danger/ disturbance
- Decision making based on the observation
- Processing appeals or ongoing communication to complainants with the aim of resolving the issue peacefully
- Publishing the responses to a complaint (need to be confirmed by the complainant)
- Organizing and applying information delivery and awareness raising campaigns
- Reporting and handling GRM results.

Capacity building: All parties involved in the SEP will attend a workshop that will orient everyone about the Project and appraise all individuals of responsibilities and reporting structures before project activities begin. A specific training will also be held for persons involved in the GRM and a manual will be developed for these users setting out how to classify complaints, where to escalate different categories of grievances received etc.

5.3 Transparency, Monitoring, and Reporting:

Transparency: Regular policies, procedures, and updates on the GRM system, complaints made and resolved, will be available on the MoF and ESCOM websites. This component will be updated every mid-year.

Routine internal monitoring and reporting: The PMU will assess the GRM function on a quarterly basis to:

- Make summaries of GRM results on a monthly & quarterly basis, including suggestions and questions, to the project team and management.

- Review the status of complaints that have not been resolved and suggest corrective actions as needed.

On the quarterly meeting, there will be a discussion and review the effectiveness and use of GRM and collect suggestions on how to improve it.

Submitting the midterm and annual progress report to the World Bank: In the midterm (semester) and annual implementation reports that are submitted to the Bank, the MoF will include GRM results, which provide the latest information as follows:

- Status of GRM formation (procedures, staffing, awareness raising, etc.);
- Quantitative data about the number of complaints received, the relevant number, and the amount completed;
- Qualitative data about the types of complaints and answers given, unresolved problems;
- The time needed to resolve complaints;
- Number of complaints resolved at the lowest level, rising to a higher level;
- Any special problems solved by procedures/staffing;
- Factors that can influence the use of the GRM / beneficiary feedback system; and
- All corrective actions used.

ANNEX 1: PROJECT GRIEVANCE LOG & RESOLUTION FORM

GRIEVANCE/FEEDBACK LOG IN

	Project District & Area	
	Date	
No	Grievance No.	
1	GRM level (select as appropriate)	<ol style="list-style-type: none"> 1. Community Grievance Redress Committee 2. District Grievance Redress Committee 3. Workers Grievance Redress Committee (WGRC) 4. National Grievance Redress Committee
2	Name of the GRC (Name as appropriate)	
3	Person Recording Grievance/Feedback	
3.1	Name of Person	
3.2	Position in GRC	
3.3	Phone Number	
4	Person reporting grievance/feedback	
4.1	Name of Person	
4.2	Aggrieved or Representative?	
4.3	Role in Project Activities	
4.4	Phone Number	
5.	Details of Grievance/Feedback	
6	Has the Grievance/Feedback been reported elsewhere? If yes, give details?	
7	Has the Grievance/Feedback been referred from elsewhere? If Yes, give details	
8	Initial Assessment of the Case	<ol style="list-style-type: none"> 1. Accepted and to be handled by GRC 2. Referred to police/Court, others 3. Rejected, lacks credibility/substance
9	Signatures	
9.1	Signature of Person Recording/GRC	
9.2	Signature of Person Reporting	
10	Name & Signature of Witness	

10.1	For the Complainant	
10.2	For the alleged perpetrator	
11	Dated Grievance/Feedback recorded	

ASSESSMENT, RESPONSE AND CLOSURE

No	Grievance No.	
11	Composition of GRC Assessing the 'Case'	
	Name of GRC Member	Position in the GRC
12	Case Assessment Approach (Specify as appropriate)	<ol style="list-style-type: none"> 1. GRC Meeting 2. GRC confirmation visits 3. Hearing with the complainant 4. Full hearing with alleged accused party 5. Other investigations (Specify)
13	Details of GRC Response/Resolution	
14	Response/Resolution Decision	<ol style="list-style-type: none"> 1. Case resolved, closed 2. Case referral (Specify)
15	Signatures	
15.1	GRC Chair/Representative	
15.2	Aggrieved person/Representative	
15.3	Accused person/Representative	
16	Name & Signature of Witness	
16.1	For Aggrieved party	
16.2	For Accused party	
17	Date of Response/Resolution	