

The Kingdom of Lesotho

Ministry of Education and Training

Ministry of Social Development

**Basic Education Strengthening Project
(P175065)**

**ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

January 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Lesotho, through its Ministry of Education and Training (MoET), and its Ministry of Social Development (MoSD), will implement the Basic Education Strengthening Project (the Project). The International Development Association (hereinafter, the Association) has agreed to provide financing for the Project.
2. The Kingdom of Lesotho, will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Kingdom of Lesotho, will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Framework, including Action Plan against preventing Gender-Based Violence, Labor Management Procedures, and Waste Management Plan (collectively, the ESMF), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Kingdom of Lesotho, is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Kingdom of Lesotho, as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Kingdom of Lesotho, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Kingdom of Lesotho, will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Kingdom of Lesotho. The Kingdom of Lesotho, will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Kingdom of Lesotho, shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts and gender-based violence.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	Six-monthly as part of Project progress reports.	MoET and MoSD
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, students, education establishment staff, local communities, the public or workers. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	Notify the Bank within 48 hours after learning of the incident or accident with the submission of any required subsequent report within a timeframe acceptable to the Association, as requested.	MoET and MoSD
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks including an E&S Specialist responsible for the day-to-day implementation of the ESMF, GBV Action Plan, and Stakeholder Engagement Plan.</p>	Within 90 days after Project effectiveness. The organizational structure, including the specialists, should be maintained throughout Project implementation	MoET and MoSD
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Prepare an Environmental and Social Management Framework (ESMF), which includes GBV Action Plan, Waste Management Plan, and Labor Management Procedures, to identify and assess the environmental and social risks and impacts of the Project and appropriate mitigation measures, in a manner acceptable to the Association.</p>	Before Appraisal	MoET and MoSD
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Screen any proposed subproject in accordance with the ESMF prepared for the Project, and, thereafter, prepare and implement the Waste Management Plan (for sub-component 1.3)), as required and if needed, in a manner acceptable to the Bank/Association.</p>	Before Appraisal. To be development as part of the ESMF.	MoET and MoSD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	MANAGEMENT OF CONTRACTORS Not relevant to the Project		
1.5	MANAGEMENT OF COMMUNITY LABOR Not relevant to the project		
1.6	PERMIT, CONSENTS AND AUTHORIZATIONS: Obtain, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities, pursuant to applicable national laws. Comply, or cause the Construction Contractor(s) to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation. The following permit apply: Basel Permit for the export, import or transit of hazardous waste. <i>Relevant Regulation:</i> Basel Convention. <i>Issuing Authority:</i> Department of Environment(DoE).	Obtain permit prior to carrying out any Project activity requiring a permit.	MoET
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Develop and implement Labor Management Procedures (LMP) for the Project including project staff, consultants, contractors, contractors workers and community workers.	Before Appraisal. To be implemented throughout project implementation.	MoET and MoSD
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Before Appraisal. To be implemented throughout project implementation.	MoET and MoSD
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Develop and implement occupational, health and safety (OHS) measures, including emergency preparedness and response measures, consistent with the ESMF and World Bank Group Environmental Health and Safety Guidelines, which shall be set out in the LMP.	Before Appraisal. To be implemented throughout project implementation.	MoET and MoSD
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the Waste Management Plan to be prepared as part of the ESMF (see action 1.3 above).	Before Appraisal. To be implemented throughout project implementation.	MoET and MoSD
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY: Not relevant to the Project		MoET and MoSD
4.2	COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers	To be implemented throughout project implementation.	MoET and MoSD
4.3	GBV AND SEA RISKS: Prepare and implement measures to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA) and include these measures in the ESMF, all proportionate to the risks posed by project activities	To be implemented throughout project implementation.	MoET and MoSD
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not Relevant to the project		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not Relevant to the project		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not Relevant to the project		
ESS 8: CULTURAL HERITAGE			
8.1	Not Relevant to the Project .		
ESS 9: FINANCIAL INTERMEDIARIES			

	Not Relevant to the project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>The Stakeholder Engagement Plan (SEP) is already been prepared and disclosed and will be implemented hereinafter to continue stakeholder engagement and consultation.</p>	To be implemented throughout project implementation.	MoET and MoSD
10.2	<p>PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.</p>	GRM established before appraisal and maintained throughout project implementation.	MoET and MoSD
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training for PIU project staff and consultants:</p> <ul style="list-style-type: none"> ESF Requirements Roles and responsibilities for environmental and social issues Occupational health and safety (including COVID-19 recommendation) Labour requirements Emergency prevention and preparedness and response arrangements to emergency situations Managing GBV/SEA risks Maintaining GRM and keeping GRM log Waste Management 	<p>Training for PIU and project staff within 90 days following project effectiveness.</p> <p>Training for PIU consultants Repeated as necessary throughout project.</p>	MoET and MoSD

THE KINGDOM OF LESOTHO
BASIC EDUCATION STRENGTHENING PROJECT
P175065

Ministry of Education and Training &
Ministry of Social Development

Stakeholder Engagement Plan (SEP)

Table of Contents

BASIC EDUCATION STRENGTHENING PROJECT BESP Stakeholder Engagement Plan (SEP) **Error! Bookmark not defined.**

Introduction/Project Description.....	Error! Bookmark not defined.
Background information on the overall Project	Error! Bookmark not defined.
Brief Summary of Previous Stakeholder Engagement Activities	Error! Bookmark not defined.
Stakeholder identification and analysis	Error! Bookmark not defined.
Affected parties	Error! Bookmark not defined.
Disadvantaged / vulnerable individuals or groups	Error! Bookmark not defined.
Stakeholder Engagement Program	Error! Bookmark not defined.
Purpose and timing of stakeholder engagement program.....	Error! Bookmark not defined.
Proposed strategy for information disclosure	Error! Bookmark not defined.
A proposed strategy for consultation	Error! Bookmark not defined.
Review of Comments.....	Error! Bookmark not defined.
Future Phases of Project	Error! Bookmark not defined.
Resources and Responsibilities for implementing stakeholder engagement activities	Error! Bookmark not defined.
defined.	
Resources	Error! Bookmark not defined.
Grievance Mechanism	Error! Bookmark not defined.
Monitoring and Reporting	Error! Bookmark not defined.

1. Introduction/Project Description

Background information on the overall Project

The Project Development Objective (PDO) of the proposed project is to “to improve student retention and teacher quality in targeted junior secondary schools and pilot specific interventions to strengthen ECCD service delivery.” To achieve the first two parts of the development objective (i.e. improve student retention and quality of teaching in math and science subjects in junior secondary schools), BESP will support several demand and supply side interventions at the junior secondary level including cash transfer for poor households, supporting adolescents through youth clubs and improving math and science teachers capacity through online teacher training. In addition, the project will provide system strengthening support to put in place key building blocks that are needed to improving access and quality of ECCD service delivery in Lesotho, including through the piloting and evaluation of the revised ECCD curriculum and through mapping of service providers in the sub-sector.

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

2. Table 1: Proposed project Components and Sub-Components

Component 1: Improving the retention of students in junior secondary education	1.1: Expand the cash transfer scheme to students from poor households
	1.2: Scaling up implementation of support groups/clubs for girls and boys
	1.3. Strengthening online training models in Mathematics and Science for junior secondary school teachers
Component 2: System strengthening to improve ECCD service delivery	2.1. Piloting and evaluating the new curriculum in reception classes and ECCD centers
	2.2. Mapping of ECCD service providers and strengthening monitoring and support systems
Component 3: Project management, capacity building and technical assistance	Project management, capacity building and technical assistance in selected areas

The Project will apply the World Bank’s Environmental and Social Framework (approved in 2018). The following E&S Standards are deemed relevant to the Project:

Environmental and Social Standards Relevance Given its Context at the Time of Appraisal

E & S Standards	Relevance
Assessment and Management of Environmental and Social Risks and Impacts	Relevant
Stakeholder Engagement and Information Disclosure	Relevant
Labor and Working Conditions	Relevant
Resource Efficiency and Pollution Prevention and Management	Not relevant
Community Health and Safety	Not relevant
Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not relevant
Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not relevant
Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not relevant
Cultural Heritage	Not relevant
Financial Intermediaries	Not relevant

3. Stakeholder Engagement Activities

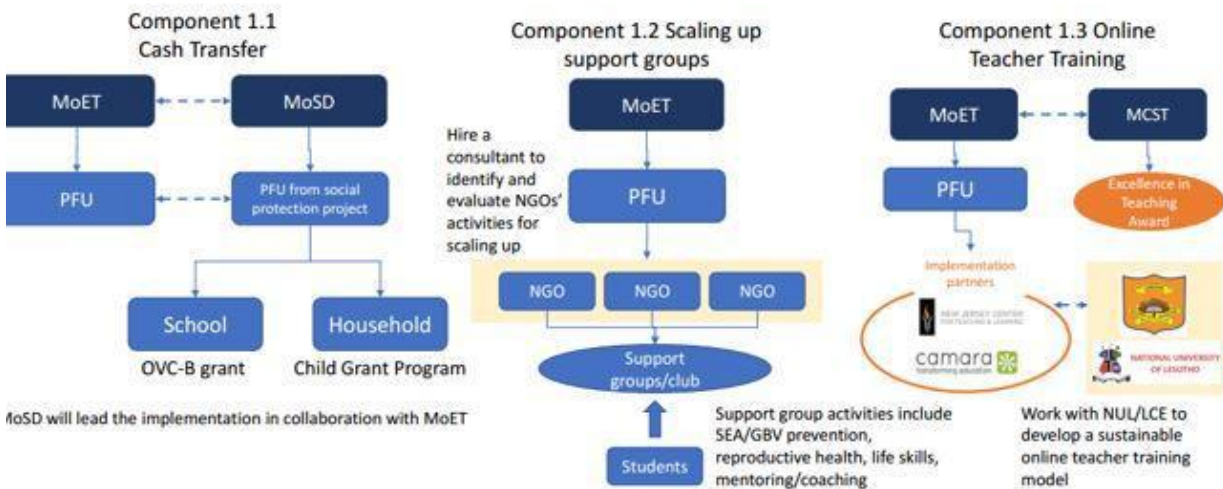
The purpose of the present Stakeholder Engagement Plan is, among others, to provide information on how Stakeholder Engagement will be practiced throughout the course of the project and which methods will be used as part of the process; as well as to outline the responsibilities of the Ministry of Education and Training (MoET) and Ministry of Social Development (MoSD). While the project is not expected to cause any serious or substantial environmental and/or social risks, the Project will apply the World Bank’s Environmental and Social Framework (ESF), and as such, will particularly ensure that requirements of ESS10 on Stakeholder Engagement are followed throughout the project implementation. As part of stakeholder engagement in preparing this project, the MoET and MoSD will work closely with the Local Education Group and other relevant ministries and agencies in Lesotho. The Local Education Group is comprised of Key Role players in the Education Sector in Lesotho, and MoET and MoSD will have to therefore work closely with them to improve outcomes of the Basic Education Strengthening Project (BESP). As part of consultations during preparation of BESP, the MoET and MoSD are engaged in ongoing dialogue with all stakeholders within the Local Education Group, as well as in coordination with each other. 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 BESP. MoET and MoSD has also stressed the importance of stakeholder

engagement with primary beneficiaries of the project – boys and girls (and their parents, legal guardians, etc.) attending junior secondary education in target constituencies (communities with low poverty rate and low school retention rate). The initial, remote consultations took in December 2020, and its main purpose was to introduce the project and gather stakeholders’ views and perceptions on the proposed project. The Project will conduct more in-depth stakeholder engagement before appraisal of the Project (by April 2021), and will continue to do so throughout Project implementation. Currently due to ongoing COVID-19 pandemic, the public health situation does not enable for in-person consultations and hence any engagement so far has been conducted remotely through phone call and video calls. The SEP will be disclosed both on MoET and MoSD’s websites, and re-disclosed as needed with necessary updates before appraisal. Meaningful stakeholder engagement will be particularly important in the context of Component 1, which among others, supports cash transfer programs for low income beneficiaries. Moreover, the project will finance community mobilization activities that will involve consultations, communication campaign and outreach activities, with the goal to role of School Based Management Committees in holding schools accountable to ensure that beneficiaries stay in school as well as strengthen the school-community relationship to improve student retention.

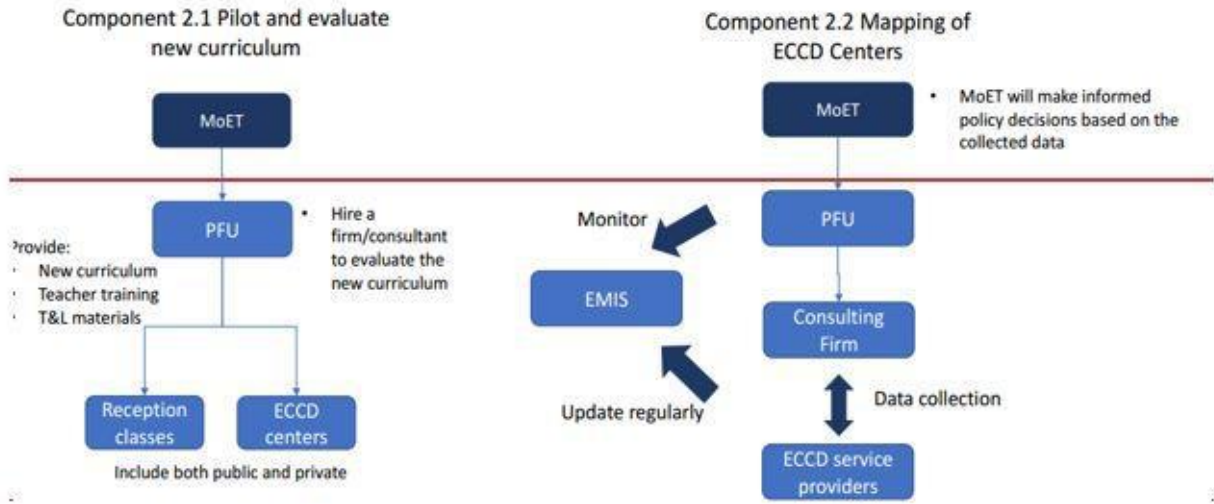
4. Stakeholder identification and analysis

The Project’s environmental risks are low to minimal, while social risks are moderate. This SEP was prepared to reflect and address those risks proportionately through stakeholder engagement. Based on the project strategy, the identification of key stakeholders will be informed and consulted about the project, including individuals, groups, or communities was informed by the figures presented below which outlines the implementation arrangements which underpin the links between key role-players in the implementation of the proposed project activities. The Figures have shown the key role players by component across the 3 project components.

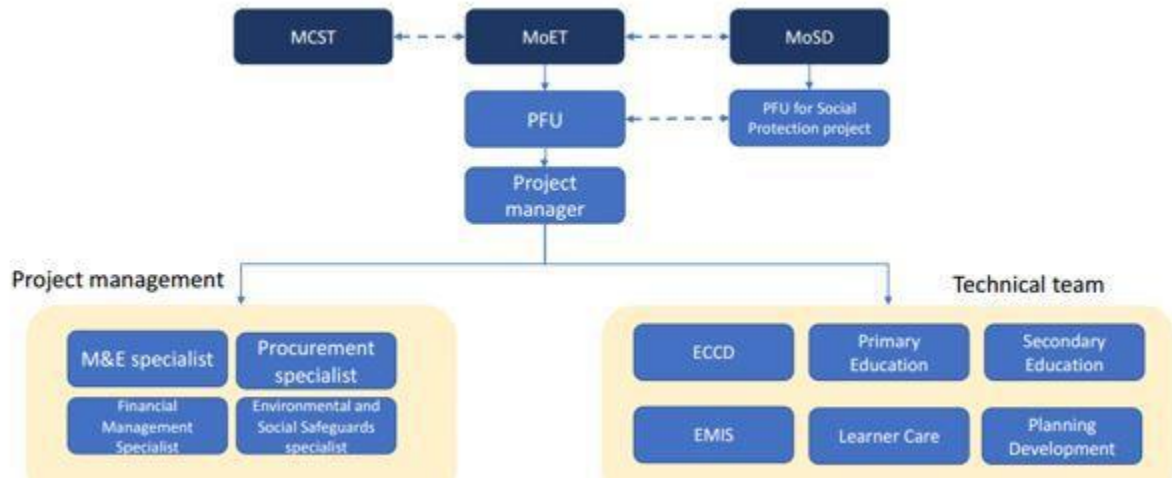
Component 1 Stakeholders and Implementation Arrangements



Component 2 Stakeholders and Implementation Arrangements



Component 3 Stakeholders and Implementation Arrangements



In addition to the offices seen on figures 1,2 and 3 it is worth mentioning that other role-players by virtue of their inherent existence in the Education Sector will be included. These will include amongst others, representatives of proprietors i.e. churches, communities and government, Development partners such as LCN and UNICEF, Teacher Training Institutions such as The National University of Lesotho and the Lesotho College of Education.

The ultimate beneficiaries of the Project will be boys and girls attending junior secondary education in target constituencies, which have high poverty rate and low student retention rate. Student are expected to directly benefit from the OVC-B and CGP grants through the project's Component 1.1. In addition, students enrolled in junior secondary grades will benefit from improved classroom instruction in mathematics and science as the result of the online teacher training intervention and the youth club interventions that will be scaled up. Direct project beneficiaries will also include 1,607 math and science teachers that will be trained as well as project staff at the MOET and MOSD. The exact schools which will benefit from this intervention will be identified and consulted on by appraisal. This SEP will be updated and re-disclosed accordingly to reflect that information.

3.1. Affected parties

The project is expected to benefit ECCD level children in select schools and their caregivers, learners from primary schools and their teachers as well as secondary level learners and their teachers. The grants will be coordinated through the Ministry of Social Development whereas the Ministry of Communication, Science and Technology on the online training models. Ministry of Communication, Science and Technology is not an implementing entity, but will collaborate with MoET and MoSD on this activity. The list of schools will be appended in due course before appraisal by April 2021.

The project activities do not pose significant environmental or social risks, and thus, the scope of the project's stakeholder engagement will mostly focus on project beneficiaries given the project's overall positive impacts. Potential groups that may be deemed as adversely affected parties could be vulnerable or disadvantaged groups that were not properly consulted, included, or had other challenges in accessing project benefits or information about the project. To address these issues, the Project will set up Project-

level grievance redress mechanism (GRM) as described below. Said GRM will build upon experiences in from other two ongoing education projects supported by the World Bank in Lesotho.

3.2. Disadvantaged / vulnerable individuals or groups

It is particularly important to understand project impacts and whether they 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. The following can help outline an approach to understand the viewpoints of these groups:

- The grants activity is particularly based on need as will be postulated by the implementing departments with counsel and criteria review from knowledgeable institutions such as the Ministry of social development. The likely beneficiaries may need to be sensitized and made aware of the criteria for selection. The manner in which the information is shared as most of the mainstream modalities for information dissemination may be through channels that are not accessible to vulnerable people. Examples of simple yet unattainable channels may include newspapers and TV adverts and in some instances radio relative to community level Pitsos.
- In Lesotho there are a few minority groups which include most notably a sector of the Phuthi Tribe found mostly in the Quthing and Qacha's nek. If the benefits of the projects will accrue to schools in these districts care has to be made to ensure that the language barrier does not impede knowledge of any likely benefits at the community level.
- The best approach for dissemination of information to be explored are National radio, community radio's, National Television, Newspapers, Schools level public notice boards, Community level Pitsos, sms based information sharing and electronic media through sharing platforms and the government websites.
- Funding will be needed to pay for all these services in order to attain desired results. (Examples are providing translation into Sephuthi language; selecting accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns e.t.c.)
- As a result of the ongoing MoET programmes in Lesotho, the project will adopt the ongoing approach for continued engagement with vulnerable stakeholders and their representatives.

Below table is a preliminary snapshot of stakeholder engagement needs:

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means	Specific needs (accessibility)
	Parents with young 3-5 year olds	Approximate households affected; children	Sesotho	Written information, radio, Pitso's/meetings	Child care for meetings
	Parents and caregivers of	extended families, poverty level	Sesotho, Sephuthi	Visit with translator and civil society representative	Graphics, education on selection process
	Secondary school learners		Sesotho and English	School level information sharing by school leadership	School level information sharing by school leadership
	Teachers trained in STEM subjects		Sesotho and English	School level information sharing by school leadership	School level information sharing by school leadership

5. Stakeholder Engagement Program

4.1. Purpose and timing of stakeholder engagement program

The main goal of the Stakeholder engagement plan is primarily to garner all support of the education sector. This support will allow for ease of implementation as it is assumed that mobilization of these stakeholders will provide an enabling environment for implementation of activities that will include amongst many others, training and procurement of teaching and learning materials. The ongoing sharing of information will be aligned with ongoing meetings that already exist. Examples of such meetings include Local Education Group *ad-hoc* meetings at the central level as well as the ongoing school level board meetings. In addition to these outlined meetings it is worth mentioning that, there will be progress updates on implementation of project activities at different levels. These updates will be provided by the different implementers of project activities. Documentation of these meetings will form part of project documentation.

This (SEP) shall be informed by a set of principles defining its core values underpinning interactions with identified stakeholders. Common principles based on "International Best Practice" include the following:

- **Commitment** is demonstrated when the need to understand, engage and identify the community is recognised and acted upon early in the process;
- **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust;

- **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and affected communities are recognised;
- **Transparency** is demonstrated when community concerns are responded to in a timely, open and effective manner;
- **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- **Trust** is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

4.2. Proposed strategy for information disclosure

Information and data that will be shared will be information about the project description that will include among many other issues, the project background, the theory of change and the summarized presentation of each of the project components and sub components. The projects beneficiaries selection will also be outlined. This is information that will largely be shared at the early stages of the project. This will be presented in document format to the district offices who will in-turn present these to school boards of selected schools. These documents will also be published in the Government of Lesotho website as well as the Ministry of Education and Training, and Ministry of Social Development websites. There will also be presentations and discussions over scheduled radio and television platforms where Ministry Officials responsible for implementation, management and coordination 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 Ministries will also use the platforms below to reach more stakeholders who do not have easy access to information:

- Newspapers, posters, radio, television;
- Information centers and exhibitions or other visual displays;
- Brochures, leaflets, posters, nontechnical summary documents and reports;
- Official correspondence, meetings;
- 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. The most critical aspect of the strategy is the leveraging of school boards engagement and coordination with the District Education Offices.

4.3. Proposed strategy for consultations

The Education Sector has a range of stakeholder groups as earlier identified. These include members of the Local Education Group, School Proprietor Representatives (churches, government and communities), School boards which will in turn have access to the communities and community level governance structures as a result of their composition, District Education Officials, Ministry Officials and the general public. The Ministry of Education Information Office will be responsible for coordination of all these events and will keep a schedule of implementation of all outreach activities and 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

Stakeholder engagement techniques

Engagement Technique	Appropriate application of the technique
Correspondences (Phone, Emails)	<ul style="list-style-type: none"> • Distribute information to Government officials, NGOs, Local Government, and organisations/agencies • Invite stakeholders to meetings and follow-up
One-on-one meetings	Seeking views and opinions <ul style="list-style-type: none"> • Enable stakeholder to speak freely about sensitive issues • Build personal relationships • Record meetings
Formal meetings	Present the Project information to a group of stakeholders <ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • 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 • Facilitate meetings with presentations, PowerPoint, posters etc. • Record discussions, comments, questions.
Focus group meetings	<ul style="list-style-type: none"> • 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 communities • Record responses
Project website	<ul style="list-style-type: none"> • Present project information and progress updates

	<ul style="list-style-type: none"> • Disclose SEP, GRM and other relevant project documentation
Project leaflet	<ul style="list-style-type: none"> • Brief project information to provide regular update • Site specific project information.
Surveys	<ul style="list-style-type: none"> • Gathering opinions and views from individual stakeholders • Gather baseline data • Record data • Develop a baseline database for monitoring impacts
Workshops	<ul style="list-style-type: none"> • 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

4.6 Review of Comments

In engaging with the public the Information will document discussions with collaboration from the implementing departments and will organize and present this collated information for documenting decisions made, concerns that need to be addressed and any other pertinent issues that might need to be referenced at any point in time during project implementation or at the end of the project. This will be done by documentation of presentations made, drafting of minutes from meeting or transcription of recordings of meetings.

4.7 Future Phases of Project

Stakeholders and the public will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism. The Projects will report at least annually to stakeholders, but often will report more frequently during particularly active periods, when the public may experience more impacts or when phases are changing.

In addition to preliminary consultations that took place in December 2020, more in-depth stakeholder engagement activities, using the techniques described above in the chart, will be conducted prior to appraisal (by April 2021). This SEP will then updated accordingly.

6. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

The cost of the stakeholder engagement activities can be benchmarked with those undertaken in both “Lesotho Education Quality for Equality Project” and “Lesotho Basic Education Improvement Project” in terms of cost estimation. This rationale therefore brings an estimated cost of about US \$ 50,000.00 which will be allocated from the overall project allotment. Other resources to be committed will organized as such:

- The MoET Information Office (in close coordination with MoSD) will be in charge of the SEP in liaison with the project development team lead by the department of planning
- The MoET (in close coordination with MoSD) it committed to the implementation of the project as well as the implementation of the SEP in keeping with requirements and good governance pillars therefore makes a commitment to commit some of the project funds towards the implementation of the SEP activities.
- Additional information on SEP related activities will be available from the Information office with support from the department of planning at the Ministry of Education (in close coordination with MoSD) . The physical Offices are at Ministry of Education and Training, Off Constitution road, Maseru. The telephonic inquiries can be made at (+266) 22214400. Additional information will be available at the following website; www.gov.ls/ministry-of-education-and-training/

7. Grievance Mechanism

Introduction

Transparency and accountability are core elements of the Project. For this purpose, the project will include a Grievance Redress Mechanism (GRM). The goal of the GRM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. The GRM is a mechanism that allows for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve project impact.

The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

The GRM procedures will be improved further by appraisal (April 2021) to include special guidelines to handle GBV-sexual harassment related complaints and grievances, taking into account their sensitivity. Procedures that will handle GBV-related issues will be based on the following key guiding principles that must be systematically applied to adequately respond to the specific nature of SEA/SH cases: confidentiality, survivor-centricity, and survivor safety.

Definition of GRM

For the purposes of these Operational Guidelines, a Grievance Redress Mechanism is a process for receiving, evaluating, and addressing project-related complaints from citizens and affected communities at the level of the project.

The terms 'grievance' and 'complaint' are used interchangeably.

GRM scope and use

SCOPE: Grievance Redress Mechanism will be available for project stakeholders and other interested parties to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

GRM's users: Project beneficiaries, project affected people (i.e. those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader citizenry can use the GRM for the above purposes (see Scope).

GRM's management: The GRM is managed by the PIUs, under the direct responsibility of PIU

Submission of complaints: Complaints can be expressed at any time throughout project implementation.

Procedures

Channels to make complaints

BESP establishes the following channels through which citizens/beneficiaries/Project Affected Persons (PAPs) can make complaints regarding project-funded activities:

- a. By Email: lineomokitimi@gmail.com
- b. Through the following web page <https://www.gov.ls/>, <https://www.education.org.ls/>
- c. In writing to MoSD and MoET: Constitution Rd, Maseru, Lesotho (Coordinates [-29.3123967, 27.4815424](#)); Constitution Rd, Maseru, Pension Fund Building, Level 3, Lesotho

The project shall ensure flexibility in the channels available for complaints, as well as ensure accessibility to the contact information for individuals who make complaints.

Receipt and recording of complaints

The person receiving the complaint will complete a grievance form (see Annex A) and will record the complaint in the Register of Complaints, kept under GRM manager. Then, the complaint is to be submitted immediately to the tracking system for sorting and redirecting to the appropriate department responsible for investigating and addressing the complaint, or to staff if the complaint is related to a specific project activity. The Project Coordinator is responsible for determining who to direct the complaint to, whether a complain requires an investigation (or not), and the timeframe to respond to it.

When determining who will be the investigating officer, the Project Coordinator should ensure that there is no conflict of interest, i.e. all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.

Once the investigation process has been established, the person responsible for managing the GRM records and enters this data into the Register of Complaints.

The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications.

Review of the Complaints/Inquiries

The person responsible for investigating the complaint will gather facts in order to generate a clear picture of the circumstances surrounding the grievance. The investigation/follow-up can include site visits, review of documents and a meeting with those who could resolve the issue.

The results of investigation and the proposed response to the complainant will be presented for consideration to the PIU E&S staff, who will jointly with PIU directors both at MoSD and MOET will decide on the course of action. Once a decision has been made and on the complainant informed, the investigating specialist describes the actions to be taken in the grievance form (see Annex A), along with the details of the investigation and the findings, and submits the response to the Directors for signing.

Response to complainant

The complainant will be informed about the results of verification via letter, email or by post, as received. The response shall be based on the materials of the investigation and, if appropriate, shall contain references to the national legislation.

The deadline for investigating the complaint may be extended by 30 working days by the PIU, and the complainant is to be informed about this fact, whether:

- a) additional consultations are needed to provide response to the complaint;

- b) the complaint refers to a complex volume of information and it is necessary to study additional materials for the response.

Awareness building

5.1 Information provided in an accessible format

Information about the Grievance Redress Mechanism will be available at the <https://www.gov.ls/>, <https://www.education.org.ls/> website will be included in communications with stakeholders.

Staffing and capacity building

Tasks and responsibilities of the PIU team on the GRM

The Ministries will allocate responsibilities to the PIU E&S staff. These will be documented in the Project Operations Manual, and kept updated.

- Overall management of the GRM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording complaints
- Notification to the complainant on the receipt and timeline to review a complaint
- Sorting/categorization of complaints
- Thorough examination of the issues, including the causal link between project activities and alleged damage/harm/nuisance
- Decision-making based on such examination
- Processing appeals or continuous communication with complainants with the purpose to resolve issues amicably
- Publishing responses to complaints, unless otherwise is requested by complainants due to privacy or other concerns
- Organization and implementation of information materials and awareness campaigns
- Reporting and feedback on GRM results.

Transparency, monitoring and reporting

Transparency

Policies, procedures and regular updates on the GRM system, the complaints made and resolved, will be available on the <https://www.gov.ls/>, <https://www.education.org.ls/> web page. They will be updated quarterly.

Regular internal monitoring and reporting

The Directors will assess quarterly the functioning of the GRM in order to:

- Provide a monthly/quarterly snapshot of GRM results, including any suggestions and questions, to the project team and the management.
- Review the status of complaints to track which are not yet resolved and suggest any needed remedial action.

During quarterly PIU meetings, the project team shall discuss and review the effectiveness and use of the GRM and gather suggestions on how to improve it.

Reporting in half-yearly and annual progress reports submitted to the World Bank

In the semi-annual project implementation reports submitted to the Bank, BESP shall include a GRM section, which provides updated information on the following:

- Status of establishment of the GRM (procedures, staffing, awareness building, etc.);
- Quantitative data on the number of complaints received, the number that were relevant, and the number resolved;
- Qualitative data on the type of complaints and answers provided, issues that are unresolved;
- Time taken to resolve complaints;
- Number of grievances resolved at the lowest level, raised to higher levels;
- Any particular issues faced with the procedures/staffing or use;
- Factors that may be affecting the use of the GRM/beneficiary feedback system;
- Any corrective measures adopted.

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 (ie: School board, PIU)	Please indicate if you are aware of the stakeholder pursuing the matter further through other avenues outside the PIU. 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.

8. Monitoring and Reporting

7.1. Involvement of stakeholders in monitoring activities

The role of stakeholders in the project through observation and objective reporting for improvement of programming cannot be overstated. The MoET and MoSD will be conducting periodic consultations throughout implementation. Outcomes of the noteworthy grievances will be made public, and both MoSD and MoET commit to transparency. In addition, SEP will be updated regularly and disclosed on the websites of both ministries. The PIUs within both ministries, and E&S specialist who will be hired, will be responsible for ensuring SEP is followed throughout project implementation, as well as ensuing coordination with the World Bank's E&S team.

