

***Rwanda Advancing Citizen Engagement Project (P172862)***

**Stakeholder Engagement Plan (SEP)**

*November 2020*

**List of Acronyms:**

ACEP	Advancing Citizen Engagement Project
CBF	Community-Based Facilitator
CSO	Civil Society Organization
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
LODA	Local Administrative Entities Agency
GRM	Grievance Redress Mechanism
M&E	Monitoring and Evaluation
MINALOC	Ministry of Local Government
MINECOFIN	Ministry of Economy and Finance
NFPVP	National Framework for Participatory Village Planning
NGO	Non-Governmental Organization
PAP	Project Affected People
RAB	Rwanda Agriculture and Animal Resources Development Board
RDB	Rwanda Development Board
RELM	Research, Evaluation, Monitoring, and Learning
REMA	Rwanda Environment Management Authority
RGB	Rwanda Governance Board
SEP	Stakeholder Engagement Plan

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## 1. Introduction/Project Description

The ACE project will be financed by a US\$2.73 m grant from the World Bank-administered Japan Social Development Fund. The Grant Recipient will be Charity Projects (operating name Comic Relief), which will be legally responsible for compliance with the World Bank's Environmental and Social Standards. Comic Relief will pass the funding on to Spark Microgrants (together with US\$3 million of its own funding), which will be responsible for implementation on the ground.

The ACE Project will combine grassroots and policy level activities to improve livelihoods for 17,749 households/76,323 people and the capacity of villages and national and local government for citizen engagement in 249 villages in Rwanda. The Project will strengthen rural livelihoods and establish a National Framework for Participatory Village Planning (NFPVP) that will institutionalize participatory and inclusive village development planning, at the village level, in Rwanda. The project aims to catalyze an important evolution in Rwanda's dominant development model to become more participatory and reach those otherwise left behind from development programming, including the COVID-19 recovery efforts. The project will support village-driven planning and livelihood programs in 249 villages in four districts - Burera, Gakenke, Gicumbi, and Huye. Experience from the village-level activities will then be translated into a national policy framework for participatory village planning, in partnership with central and local government.

The project will be implemented through four components:

- **Component One: Village and Local Government Capacity Building.** This component will build the capacity of local government at the district, sector, and cell levels to facilitate village-driven village development processes to enhance citizen engagement, which will in turn improve rural livelihoods. It will also build village capacity to engage in development planning and to manage village level subprojects. District, sector and cell level local Government officials will be trained on the Facilitated Collective Action Process (the 'FCAP', also known as Inzira y'Iterambere in Kinyarwanda). The FCAP is a two-year village mobilization and capacity building process which establishes a platform for development coordination at the village level that includes the creation of a Village Leadership Committee and the formulation of a multi-year village development plan.
- **Component Two: Microgrants.** Component Two will finance priority subprojects identified in the VDPs to improve livelihoods. Each target village will be provided a grant of US\$8,000, disbursed over two years. The government in each of the target districts will contribute five (5) percent of the total grant amount, while village members will make contributions in-kind. Microgrant eligibility for every target village requires that eligibility conditions are met, including the election of a Village Leadership Committee, and submission and approval of a subproject proposal.
- **Component Three: National Framework for Participatory Village Planning.** Component Three will consolidate lessons from the pilot activities under Components One and Two and support the government of Rwanda to prepare a National Framework for Participatory Village Planning.
- **Component Four: Project Management, Monitoring and Evaluation, and Knowledge Dissemination.** This component includes overall project management, monitoring and evaluation, and communications and knowledge dissemination.

The ACE Project is being prepared under the World Bank's Environment and Social Framework (ESF). The implementing party was required to prepare an Environmental and Social Management Framework (ESMF) to provide guidance on the management of environmental and social impacts and risks. The ESMF also provides for the institutional arrangements and environmental and social safeguards instruments to be prepared as part of the implementation of ACE Project activities in full compliance with Government of Rwanda regulations and the World Bank Environmental and Social Framework (ESF). The ESMF for the ACE Project was prepared in September and early October 2020.

Based on consultation findings and baseline data collected in project Districts, the ESMF found that the environmental and social risk is expected to be moderate - comprising a 'low' rating for social risk, and a 'moderate' rating for environmental risk. Risks may include greenhouse gases emissions and air pollution, health and safety risks, loss of biodiversity, water and soil deterioration and noise pollution.

As per the Environmental and Social Standard (ESS) 10 Stakeholders Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner. This must be free of manipulation, interference, coercion, discrimination and intimidation. The Project ESMF also recommends that during implementation, further consultation be organized with wider stakeholders and communities and that a Stakeholder Engagement Plan (SEP) will be developed to guide the process.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The nature of the ACE Project, revolving around a citizen engagement platform (regular village meetings), means that effective stakeholder engagement is both an integral part of the project design and implementation, as well as necessary to ensure effective safeguards and public disclosure of information. This SEP encapsulates activities that i) are specific to safeguarding tools and information disclosure, ii) are part of routine project implementation, such as regular public village meetings and workshops with local government officials, and iii) are additional consultations to inform project design and learning, as recommended in the Project ESMF. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities, and to minimize and mitigate environmental and social risks related to the proposed project activities.

### **Relevant Environmental and Social Standards**

The following are the Bank ESF environmental and social standards (ESSs) that apply to the ACE project.

- **ESS 1:** Assessment and Management of Environmental and Social Risks and Impacts.
- **ESS 2:** Labor and Working Conditions;
- **ESS 3:** Resource Efficiency and Pollution Prevention and Management
- **ESS 4:** Community Health and Safety.
- **ESS 6:** Biodiversity Conservation and Sustainable Management of Living Natural Resources
- **ESS 8:** Cultural Heritage

- **ESS 10:** Stakeholder Engagement and Information Disclosure. Following the requirements of this ESS, the government of Rwanda has prepared this SEP, which includes a description of the project-specific grievance redress mechanism (GRM).

**Applicable Policies and Regulations in Rwanda**

The following legal and regulatory instruments apply to the project:

- Rwanda Environment Policy
- Agriculture Policy
- Land Policy
- Health Sector Policy
- National Strategy for Transformation 1 (NST1)
- National Water Resources Management Policy
- Green Growth and Climate Resilience Strategy
- Rwandan Constitution
- Law on Environment
- Law n° 43/2013 of 16/06/2013 governing land in Rwanda
- Ministerial order N° 003/2008 of 15/08/2008 relating to the requirements and procedure for environmental impact Assessment
- Ministerial order N°001/2019 of 15/04/2019 establishing the list of projects that must undergo an environment impact assessment, instructions, requirements and procedures to conduct environmental impact assessment

In addition, World Bank industry sector guidelines for agribusiness apply to the Project, including the mammalian livestock production, dairy processing and meat processing guidelines, and the Good Practice Note on Animal Welfare.

**Project Location:**

Components One and Two of the project will be implemented in the following sectors and districts. Component Three of the project will focus on Kigali, with outreach to the below districts and sectors<sup>1</sup>:

<b>Northern Province</b>	<b>Gakenke District</b>	Busengo Sector
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<sup>1</sup> Target Districts were selected based on official Government data on levels of poverty and vulnerability, and based on consultations with the top 2-3 Districts in each Province to discuss their willingness to engage in the Project and ability to contribute towards project goals. Within the target Districts, Sectors were selected based on official data from District Government on levels of malnutrition and poverty rates, combined with operational considerations. The top 3-5 sectors in each district were shortlisted based on having the highest levels of malnutrition (under 5yo) and highest levels of their population in Ubudehe Category 1 and 2. Shortlists were then consulted with District officials to confirm viability, including whether or not they have a full staff of SEDOs, can provide office space, and any other concerns/factors (e.g. one sector was ruled out because of the presence of a large refugee camp which is under the umbrella of other organisations and authorities and isn't suitable for the project interventions).

	<b>Gicumbi District</b>	Mutete and Cyumba Sectors
	<b>Burera District</b>	Rwerere and Kinyababa Sectors
<b>Southern Province</b>	<b>Huye District</b>	Gishamvu and Kigoma Sectors

Spark has offices in Kigali and Musanze, and operates out of local government offices at the district and sector levels. All offices and project locations are accessible by car and/or motorcycle from Spark and government offices.

## 2. Brief Summary of Previous Stakeholder Engagement Activities

Several consultation activities have been conducted to date, namely;

- Consultations during 2018 and 2019 to inform the design of the ACE Project with local government officials, central government officials, and beneficiaries from previous, pre-pilot activities implemented by Spark.
- Consultations in September 2020 with project beneficiaries - both local government officials and village members - on the design of the proposed project, with a specific focus on COVID-safe community meetings, village sub-project grants, and views on citizen engagement practices.
- Informal consultations through 2019 and 2020 with the Ministry of Local Government (MINALOC), Ministry of Economy and Finance (MINECOFIN), and Local Administrative Entities Development Agency (LODA) on the proposed ACE project design and financing.
- Consultations on environmental and social risks and safeguards to support preparation of the ESMF in September 2020 with the stakeholders mentioned below. Stakeholders consulted were informed of the proposed project, potential project impacts and risks, and provided their feedback on the project interventions.
  - District authorities from two of four project Districts (Gicumbi in the North and Huye in the Southern Province);
  - Rwanda Development Board (RDB);
  - Rwanda Agriculture and Animal Resources Development Board (RAB);
  - The Rwanda Environment Management Authority (REMA); and
  - MINALOC.

## 3. Stakeholder identification and analysis

For the purposes of effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

- *Affected Parties* – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- *Other Interested Parties* – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project

- and/or who could affect the project and the process of its implementation in some way; and
- *Vulnerable Groups*<sup>2</sup> – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

These are described in the sub-sections below.

### 3.1. Affected parties

Affected parties and individuals, groups, local communities, and other stakeholders that may be directly or indirectly affected by the project, positively or negatively.

Stakeholder Group	Number and Location	Expected ACE Project Engagement/Interest
Village Members	152,645 village members from 249 villages in Rwerere and Kinyababa Sectors of Burera District, Busengo sector of Gakenke District, Mutete and Cyumba Sectors of Gicumbi District, and Gishamvu and Kigoma Sectors of Huye District in the Northern and Southern Provinces of Rwanda	Village members from all target villages will attend (or not) and be represented (or not) in weekly village meetings under Component One or the Project, which includes the option of electing village leaders and influencing village development planning decisions. Under Component Two, residents may benefit (or not) from the selected village sub-project. Residents who do or do not attend meetings and opt in to project participation will nonetheless be affected by the project’s presence in their village and the engagement of their neighbors in the initiatives.
Social and Economic Development Officers (SEDOs)	38 SEDOs from Rwerere and Kinyababa Sectors of Burera District, Busengo sector of Gakenke District, Mutete and Cyumba Sectors of Gicumbi District, and Gishamvu and Kigoma Sectors of Huye District in the Northern and Southern Provinces of Rwanda	SEDOs from the target Sectors will be trained by Spark to support Components One and Two of the project. This will require significant time commitments from them. SEDOs will receive a communications stipend under Component One of the project to support the additional responsibilities for communicating with Spark and target villages.
Sector Office Staff	Government offices of Rwerere and Kinyababa Sectors of Burera District,	Sector-level Government officials will come into regular contact with the project through direct engagement of the Spark staff and SEDOs implementing Components One and Two of the project,

<sup>2</sup> Vulnerable status may stem from an individual’s or group’s race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.



	<p>Busengo sector of Gakenke District, Mutete and Cyumba Sectors of Gicumbi District, and Gishamvu and Kigoma Sectors of Huye District in the Northern and Southern Provinces of Rwanda</p>	<p>and may be requested to consult with Spark and other Government agencies towards Component Three of the project. Some sector-level officials will receive training under Component One of the Project.</p>
<p>Sub-project Technical Advisers (TAs)</p>	<p>249-496 TAs from Rwerere and Kinyababa Sectors of Burera District, Busengo sector of Gakenke District, Mutete and Cyumba Sectors of Gicumbi District, and Gishamvu and Kigoma Sectors of Huye District in the Northern and Southern Provinces of Rwanda. These include existing Government technical staff, and local expert businesses people.</p>	<p>TAs from local Government offices in target Districts may be commissioned by the project to support village subprojects, and will be paid a communication stipend under Component Two of the project to perform this additional service. Other local business persons or subject matter experts may be recruited to support village sub-project design and implementation and will be contracted by Spark directly to do so.</p>
<p>District Government Offices</p>	<p>Multiple technical-level and senior officials from Burera, Gakenke, Gicumbi, and Huye Districts in the Northern and Southern Provinces of Rwanda</p>	<p>District Government officials will come into regular contact with the project through direct engagement of the Spark staff implementing Components One of the Project, including the presence of 2-3 Spark staff utilizing District Government office space. District Governments will commit to financing 5% of village sub-projects under Component 2, and will be requested to consult with Spark and other Government agencies towards Component 3 of the project. These engagements will be governed by MoUs between Spark and the respective District Governments.</p>
<p>Cell Executive office</p>	<p>38 Cell Government Offices from Rwerere and Kinyababa Sectors of Burera District, Busengo sector of Gakenke District, Mutete and Cyumba Sectors of Gicumbi District, and Gishamvu and Kigoma Sectors of Huye District in the Northern and Southern Provinces of Rwanda</p>	<p>Cell-level Government officials will come into regular contact with the project through direct engagement of the Spark staff and SEDOs implementing Components 1 and 2 of the Project, and may be requested to consult with Spark and other Government agencies towards Component 3 of the project.</p>
<p>Neighboring</p>	<p>Villages neighboring the</p>	<p>Neighboring villages may hear about the project from local</p>

villages	249 target village outlined above, in Rwerere and Kinyababa Sectors of Burera District, Busengo sector of Gakenke District, Mutete and Cyumba Sectors of Gicumbi District, and Gishamvu and Kigoma Sectors of Huye District in the Northern and Southern Provinces of Rwanda	government officials and community members, witness positive and negative impacts occurring in target villages, and possibly experience some spillover effects (for example on market access, local prices, job opportunities, etc.). Because the project takes a sector saturation approach - covering all villages in a sector - only those villages on the boundary of sectors will be adjacent to villages not covered by the Project.
Local Administrative Entities Development Agency	Located in Kigali in Kacyiru neighborhood, with project officers working from District Government Offices	Engagement of Project staff with LODA staff is expected as part of Component 3 of the project, governed by an MoU between Spark MicroGrants and LODA, and governed by the arrangements agreed by the Project Steering Committee, of which LODA will be a member. LODA is expected to benefit from technical support from the project, including consultants hired to support policy development as part of Component 3 activities.
Ministry of Local Government	Located in Kigali in Kacyiru neighborhood.	Engagement of Project staff with MINACLOC staff is expected as part of Components 3 and 4 of the Project, governed by the arrangements agreed by the Project Steering Committee, of which MINALOC will be a member.
Ministry of Economy and Finance	Located in Kigali in Kiyovu neighborhood	Engagement of Project staff with MINACLOC staff is expected as part of Components 3 and 4 of the Project, governed by the arrangements agreed by the Project Steering Committee, of which MINECOFIN will be a member.

### 3.2. Other interested parties

Stakeholder Group	Number and Location	Expected ACE Project Engagement/Interest
Other CSOs/NGOs	CSOs/NGOs operating in the target districts of Burera, Gakenke, Gicumbi, and Huye in the Northern and Southern Provinces of Rwanda, and Kigali	CSOs and NGOs may have in-depth knowledge about the environmental and social characteristics of the project area and the nearby populations, and can help play a role in identifying risks, potential impacts, and opportunities to consider and address. They may also have competing or complementary interests with the project and complementary or competing demands upon key resource people for the Project, and/or target beneficiaries.
Local businesses	Local businesses operating in the target districts of Burera, Gakenke, Gicumbi, and Huye in the Northern and Southern Provinces of Rwanda, and Kigali	Local businesses may experience shifts in demand (increases, changes or decreases) based on a) the demands of project procurement, such as suppliers of facilitation materials; b) the sub-project investments under Component 2 which may purchase from local businesses and/or go into competition with them. Local businesses may also benefit from acquiring new suppliers of products

		or produce
Veterinarians	Veterinarians operating in the target districts of Burera, Gakenke, Gicumbi, and Huye in the Northern and Southern Provinces of Rwanda, and Kigali	Veterinarians may experience shifts in demand for services based on the expected high numbers of livestock project villages may invest in through sub-projects implemented under project Component 2.
Donors	Project donors (Comic Relief, based in London, UK, the Government of Japan, and the World Bank).	Donors to the project will oversee the project via regular reporting, governed by the respective project grant agreements. Any actions taken within the project or affiliated with the project may have flow-on effects (positive or negative) on the reputation or image of the donor agency.
Ministry of Environment  Rwanda Environment Management Authority (REMA)  Rwanda Agriculture and Animal Resources (RAB)	Government offices based in Kigali, Rwanda	These agencies are key authorizing agencies for Spark's work in Rwanda. These agencies may have an interest in the social and environmental benefits and risks linked to project implementation.
Rwanda Governance Board (RGB)  Rwanda Development Board (RDB)	Government offices based in Kigali, Rwanda	These agencies are key authorizing agencies for Spark's work in Rwanda. They have an interest in the social and environmental benefits and risks linked to project implementation, as well as the institutional and implementation arrangements of the project and Spark (as a registered NGO in Rwanda).

### 3.3. Disadvantaged / vulnerable individuals or groups

Vulnerable Group	Number and Location	Limitations to participation in/consultation with the Project	Additional support/resources to be made available
Women in target villages	50% of all target beneficiary and project affected people are expected to be women	More female-headed households live in poverty than those headed by males (38 percent compared to 44 percent), and women's literacy rates are lower than men's (60 percent compared to 70 percent, respectively), which constrains already limited opportunities in terms of accessing resources, creating and managing small businesses, and	To minimize the risks to women, maximize the potential project benefits, and ensure stakeholder engagement activities are accessible and gender sensitive, Spark will ensure that; <ul style="list-style-type: none"> <li>- village meetings and consultations are all conducted in a manner accessible to literate and non-literate community</li> </ul>

		<p>participating in decision-making processes. For these reasons, and considering social norms around gender and the unequal status of women, there are greater challenges to women’s health and safety compared to men, and more restricted roles in decision-making and voice in citizen engagement processes. Existing village-level committees are male-dominated, as are public forums and decisions.</p>	<p>members</p> <ul style="list-style-type: none"> <li>- all data is gender disaggregated, with specific targets for women’s attendance and participation in public consultations and village meetings</li> <li>- all project activities are designed to maximize the voice of women in local governance processes and community-level decision-making, through gender-sensitivity training of facilitators and local government officials.</li> <li>- GRM mechanisms are accessible to women, including through the hiring of female staff to undertake frontline consultation and grievance handling in each District.</li> </ul>
<p>Disabled and Elderly people in target villages</p>	<p>A small number of people in every target village</p>	<p>As a result of both reduced mobility and/or able-bodiedness, additional physical and/or psychosocial support needs, and discriminatory social norms, disabled and elderly people may be restricted from travelling to village meetings, contributing to project activities, and being granted equal decision-making power and voice in local governance processes incorporated into the project.</p>	<p>Project activities are designed to foster the inclusion of elderly and disabled people, including through providing priority seating in public meetings, using a zone-based community-mobilization system to enhance representation of non-attending village members, and ensuring accessible space for stakeholder consultation, including 1:1 discussions and village-based consultations.</p>
<p>Individuals from lower income brackets (Ubudehe Categories 1 and 2) in target villages</p>	<p>60-95% of target villages fall into Ubudehe Category 1 and 2 (depending on the village/sector)</p>	<p>People from low income brackets with limited access to employment and/or insecure housing may be excluded from project activities due to their need to work when work is available (rather than attend meetings), as a result of negative social stigma, because of limited capacity to contribute to community projects, and due to reluctance to speak out about other community members or local government officials because of prevailing power dynamics between groups, including but not limited to relationships linked to provision of credit and/or wage labour. Existing leadership positions in villages tend to be held by those in higher welfare categories, and significant social stigma - including discriminatory attitudes towards appearance, hygiene practices, and family size - limit the civic space and public voice available to the lowest welfare categories.</p>	<p>All project activities are designed to foster the inclusion of groups in lower income brackets through emphasis on a ‘whole of village’ process which avoids engaging in stigmatizing or singling out individuals or households, while explicitly addressing drivers of exclusion. In addition, a zone-based community-mobilization system to enhance representation of non-attending village members and encourage participation of all village members is utilized. Most indicators are disaggregated to capture participation of Ubudehe categories 1 and 2, and targets are attached to their participation in citizen engagement activities. Stakeholder engagement activities will ensure convenient and accessible space for stakeholder consultation, including 1:1 discussions and village-based consultations available to those without cell phones or</p>

			the ability to reach out to Spark through other communication channels.
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### 3.4. Summary of project stakeholder needs

Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
Village Members-General	156,103 people in 249 villages in Rwerere and Kinyababa Sectors of Burera District, Busengo sector of Gakenke District, Mutete and Cyumba Sectors of Gicumbi District, and Gishamvu and Kigoma Sectors of Huye Districts. Organized in households of average 4.3 people.	Official Language - Kinyarwanda	Public meetings, local announcements and notice boards, radio, mobile phones, direct communication with village leaders	Accessibility for non-literate (voice + written messages), possibility of raising anonymous issues/feedback.
Village Members-Women	50% of population in target villages	Official Language - Kinyarwanda	Public meetings, local announcements and notice boards, radio, door-to-door conversations with neighbors or trusted friends/village leaders, mobile phones	Accessibility for non-literate (voice + written messages), childcare, day time meetings, possibility of raising anonymous issues/feedback.
Village Members-Low-income groups	60-90 % of the population in target villages in Ubudehe categories 1 and 2. 15-35% are in Ubudehe Category 1.	Official Language - Kinyarwanda	Public meetings, local announcements and notice boards, radio, door-to-door conversations with neighbors or trusted friends/village leaders, mobile phones	Accessibility for non-literate (voice + written messages), meetings not conflicting with wage-earning hours/seasons, possibility of raising anonymous issues/feedback.

Village Members- Disabled and Elderly Groups	Elderly and disabled members of the population in 249 target villages	Official Language - Kinyarwanda	Public meetings, local announcements and notice boards, radio, door-to-door conversations with neighbors or trusted friends/village leaders, mobile phones	Accessibility for non-literate (voice + written messages), disability access (or door-to-door), large print/image, possibility of raising anonymous issues/feedback.
Social and Economic Development Officers (SEDOs)	28 SEDOS in Rwerere and Kinyababa Sectors of Burera District, Busengo sector of Gakenke District, Mutete and Cyumba Sectors of Gicumbi District, and Gishamvu and Kigoma Sectors of Huye District, usually between the ages of 30 and 40, employed full-time to support village-level development.	Official Language - Kinyarwanda	Public meetings, official communications, mobile phones, check-ins with Spark staff	Quick and simple to access -they are time constrained, possibility of raising anonymous issues/feedback.
Sector Office Staff	Full-time employees of the Sector Government office, responsible for delivery of services and development projects	Official Language - Kinyarwanda	Official and informal meetings, official communications, mobile phones, in-person meetings	Possibility of raising anonymous issues/feedback.
Sub-project Technical Advisers	249-496 TAs from Rwerere and Kinyababa Sectors of Burera District, Busengo sector of Gakenke District, Mutete and Cyumba Sectors of Gicumbi District, and Gishamvu and Kigoma Sectors of Huye District in the Northern and Southern Provinces of Rwanda. These include existing Government technical staff, and local expert businesses people.	Official Language - Kinyarwanda	Public announcements on notice boards or radio, mobile phones, formal and informal meetings	Possibility of raising anonymous issues/feedback.
District Government Offices	Full-time employees of the District Government office, responsible for delivery of services and development projects, including District development budgets	Official Language - Kinyarwanda	Official and informal meetings, official communications, mobile phones, email.	Possibility of raising anonymous issues/feedback.

Cell Executive office	Full-time employees of the Cell Government office, responsible for delivery of services and development projects	Official Language - Kinyarwanda	Official and informal meetings, official communications, mobile phones, in-person meetings	Possibility of raising anonymous issues/feedback.
Neighboring villages	Rural households in sectors neighboring the project coverage areas.	Official Language - Kinyarwanda	Public meetings, local announcements and notice boards, radio, mobile phones.	Possibility of raising anonymous issues/feedback.
Local Administrative Entities Development Agency	Full-time employees and consultants/project staff of LODA, largely based in the Kigali office.	Official Language - Kinyarwanda, or English	Email, WhatsApp, mobile phones, official letters, PSC meetings	Possibility of raising anonymous issues/feedback.
Ministry of Local Government	Full-time employees and consultants/project staff of MINALOC, largely based in the Kigali office.	Official Language - Kinyarwanda, or English	Email, WhatsApp, mobile phones, official letters, PSC meetings	Possibility of raising anonymous issues/feedback.
Ministry of Economy and Finance	Full-time employees and consultants/project staff of MINECOFIN, largely based in the Kigali office.	Official Language - Kinyarwanda, or English	Email, WhatsApp, mobile phones, official letters, PSC meetings	Possibility of raising anonymous issues/feedback.
Other CSOs/NGOs	Offices of CSOs operating in Rwanda, especially in the Northern and Southern Provinces	Official Language - Kinyarwanda, or English	Email, mobile phones, NGO network newsletters or conferences	Possibility of raising anonymous issues/feedback.
Local businesses	Local businesses such as livestock sellers/breeders, restaurants, hotels, transport providers, etc. who may benefit from or be affected by project activities	Official Language - Kinyarwanda	Public radio, public notice boards, mobile phone, WhatsApp	Possibility of raising anonymous issues/feedback.
Veterinarians	Livestock veterinarians in the target districts of Burera, Gakenke, Gicumbi, and Huye.	Official Language - Kinyarwanda	Public radio, public notice boards, mobile phone	Possibility of raising anonymous issues/feedback.
Donors	The World Bank, Comic Relief, and the Government of Japan.	English	Email, online call platforms, official reports	

All other relevant central government agencies in Rwanda	Full-time employees and consultants/project staff of relevant agencies, including RDB and REMA, largely based in offices in Kigali.	Official Language - Kinyarwanda, or English	Email, official reports	Possibility of raising anonymous issues/feedback. Formal complaint mechanisms.
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#### 4. Stakeholder Engagement Program

##### 4.1. Principles for effective stakeholder engagement

The following principles will be applied to all stakeholder engagement throughout the Project;

- **Transparency:** Documentation of stakeholder engagement should be published in a timely fashion in relevant local languages through channels that are accessible to stakeholders.
- **Openness:** Stakeholders are allowed to participate in the engagement process at any time, even if they had not previously been identified as stakeholders.
- **Inclusiveness:** An inclusive engagement process should empower all relevant stakeholders to participate. This participation includes systematic engagement with, for example, women, children, youth, the elderly, people with disabilities, and other vulnerable or disadvantaged groups. An array of strategies can be deployed to mitigate obstacles to stakeholder engagement of all groups by focusing on issues of accessibility, communication, empowerment, and/or confidentiality.
- **Access to Information:** Stakeholders need access to all relevant information in advance. This principle applies to information on the consultation process as well as materials that would help stakeholders to provide informed opinions on the subject of consultation. Information can be customized and made available as needed.
- **Accountability:** The input and feedback from each stakeholder is collated and assessed, shared back with stakeholders, and brought to the attention of decision makers. Spark is accountable for the outcome of the consultation and for how stakeholder input has informed and helped shape the Project.
- **Visibility:** All those who may be impacted by a decision or are interested in participating in a consultation process need to be made reasonably aware of the process. This means making an effort to reach all impacted groups, experts, and other relevant and interested stakeholders.

##### 4.2. Purpose and timing of stakeholder engagement program

The main goals of the stakeholder engagement program are to provide communication channels with all stakeholders to support the Project’s risk management process, specifically including early identification and avoidance/management of potential negative impacts, and cost-effective project design.

Stakeholder engagement in on-going throughout the project, and will take place through the following phases;

- **Design phase:** Consultation with all stakeholders on design of project interventions
  - Prepare ESMF
  - Beneficiary and stakeholder consultations. While several consultations have already



taken place, including with project beneficiaries, Spark will conduct further consultation prior to the commencement of project activities in villages including;

- Awareness raising sessions with District, Sector and Cell-level officials
  - Awareness raising and consultation in all target villages, including an explicit ‘opt in’ to the overall project, based on sharing a full understanding of expected project activities and outcomes in public village meetings, and discussing any issues and expectations.
- **Implementation Phase:** Regular employment of stakeholder engagement activities throughout the project, including through the GRM mechanism and spaces for feedback and consultation which are built into project activities
  - Implement regular activity-based consultations with project beneficiaries, including:
    - Debriefs and feedback sessions linked to all training activities
    - Dedicated time and space for questions, comments and feedback during all formal and informal meetings with project beneficiaries
  - Prepare and disseminate project information messages in target locations, including through community-leaders and local governments. Messages will:
    - Inform stakeholders about key elements of the project
    - Raise awareness on key values, systems and communications channels imbedded in the project
    - Inform stakeholders of the GRM mechanisms available to communicate with the project management team safely and securely, formally and informally
  - Implement GRM, which will include:
    - Complaints collection through phone, SMS, in-person focus groups in villages, and community-based GRM committees
    - Confidential and efficient complaints handling and redress actions
    - GRM system performance reporting
- **Monitoring and Evaluation Phase:** Routine monitoring of project risks and impacts which may identify the need to further engage stakeholders on concerns/challenges/required changes to the project based on project progress and the materialization of any risks.
  - Regular reports on project progress and safeguards generated and submitted to Spark Management and the World Bank, as outlined in the Environmental and Social Commitment Plan (ESCP)
  - Internal and informal reports on stakeholder ownership and satisfaction generated by project staff and submitted to Spark Management
  - Documentation of all lessons learned
  - Corrective actions of adjustments taken, in consultation with stakeholders, including the World Bank and Government of Rwanda
  - Any significant changes to the project activities, locations, or expected outcomes will be communicated to affected stakeholders

#### 4.3. Proposed strategy for information disclosure

Project information will be disclosed to all stakeholders to communicate project activities, and any significant changes to the project resulting in additional risks and impacts. Information disclosure will be undertaken through the following channels:

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/dates	Target stakeholders	Percentage reached	Responsibilities
Project start-up	Project approach, project activities, project risks and impacts	District Office awareness raising meeting	Within 60 days of project start	Local government officials	80% of local government office	Provincial Program Manager
		Village-level awareness raising/introductory meeting	Within 60 days of project start	Village members	80% of all villages	District Trainers
	Project documents	Post on website	Within 30 days of project start	Donors, Board of Directors, any other interested parties	N/A	Project Managing Director
Project Implementation	Updated project documents (as necessary)	Post on website	Within 30 days of updates being confirmed	Donors, Board of Directors, any other interested parties	N/A	Project Managing Director
	Updated project approach, project activities, project risks and impacts	District Office meeting/consultation	Within 30 days of updates being confirmed	Local government officials	80% of local government office	Provincial Program Manager
		Village-level awareness raising/introductory meeting	Within 30 days of updates being confirmed	Village members	80% of all villages	District Trainers
Project closure	Project handover/exit information	Village level and local government meetings	90 days prior to project close	Village members and local government officials	80% of all villages and local government officials	District Trainers

	Project impact statements and progress reports/evaluations	Report dissemination through Spark website, WB website, and a conference in Kigali	Within 90 days of project closure	Any concerned stakeholders	All relevant central and local government officials	Project Managing Director
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**4.4. Proposed strategy for consultation**

The following methods will be used to consult with each of the stakeholder groups, and may vary according to target audience:

Stakeholder Group	Methods of consultation	Responsibilities
Village members	<ul style="list-style-type: none"> <li>Participatory methods (during village meetings)</li> <li>Public meetings (regular and bespoke village meetings)</li> <li>Focus groups on specific topics (as part of GRM and routine monitoring)</li> <li>Key informant interviews (as part of GRM and routine monitoring)</li> </ul>	RELM Officers, District Trainers
Local Government Officials	<ul style="list-style-type: none"> <li>Quizzes and questionnaires (as part of awareness raising and training activities)</li> <li>Public meetings (at village level, with villagers)</li> <li>Focus groups and workshops on specific topics</li> <li>Key informant interviews</li> </ul>	District Coordinators, Provincial Program Managers.
Central Government Officials	<ul style="list-style-type: none"> <li>Workshops on specific topics</li> <li>Formal and informal meetings for discussion and decision-making, including Project Steering Committee meetings.</li> </ul>	Project Managing Director

**4.5. Proposed strategy to incorporate the view of vulnerable groups**

The views of vulnerable groups will be actively sought during consultation processes. In particular, all focus groups will be gender balanced, and Spark has allocated human and financial resources to regular facilitation of village-based consultation platforms designed with sensitivity to village-level social and power dynamics, to elicit the views of women and people in lower welfare categories in particular. The use of verbal and face-to-face communication channels is designed to make consultations accessible to those with lower levels of literacy, lower rates of mobile phone ownership, and less time for travel and meetings as they try to care for their families. All Trainers and Community-Based Facilitators will receive training on gender sensitive facilitation and program implementation in efforts to create a safe and comfortable space for consultation with women. Female staff will be present in all District offices.

**4.6. Future Phases of Project**

Stakeholders 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 project will report on implementation of the ESMF/ESCP and SEP and on project progress annually to stakeholders. In addition, the project will report informally during community meetings on a weekly basis during the most intensive phase of project implementation, when villages are making their village development plans, preparing and submitting their proposals for subproject financing, and implementing subprojects.

## 5. Resources and Responsibilities for implementing stakeholder engagement activities

### 5.1. Management functions and responsibilities

The project Managing Director is ultimately accountable for implementation of this SEP. They are able to draw on the support of the Rwanda-based program, operations and RELM staff to facilitate consultations. They will also oversee implementation of the GRM mechanism in particular and receive regular performance reports on the GRM system from the RELM team.

In particular, the following responsibility matrix applies to the SEP:

Activity	Responsibilities	Documentation and Tracking
GRM	<p><b>Program Staff</b> - responsible for collecting information and socializing the system</p> <p><b>RELM Officer</b> - response for collecting grievances, categorizing them, allocating follow-up responsibilities across the organization as required, and tracking overall performance of the GRM</p> <p><b>Managing Director</b> - Ultimately accountable for GRM performance</p>	Regular reporting to the Managing Director on GRM performance, and to donors.
Activity-based consultations with beneficiaries (feedback and reflection during and after activities/meetings)	<p><b>Program staff</b> - responsible for facilitating reflection and discussion following all taskforce and village meetings. Responsible for documenting these as passing findings to Program management</p> <p><b>Provincial Program Managers</b> - responsible for consolidating reporting and sharing feedback and actions during quarterly retreats, and for raising any serious issues to the Managing Director</p>	<p>Regular reporting during quarterly retreats.</p> <p>Documented meeting notes and workshop outcomes to be saved on the secure program drive and shared with the Country Director and Managing Director</p>
Central Government consultations	<p><b>Managing Director + Policy Coordinator</b> - responsible for documenting all meeting/workshop/conference outcomes</p> <p><b>Managing Director</b> - responsible for regular meetings with central Govt stakeholders and donors to identify and address any issues</p>	Document all consultations and include in consolidated donor reports as required.
Information disclosure	<b>Managing Director</b> - accountable for all information disclosure actions, including ensuring projects reports and documents are available online and that community members and other project affected people are fully informed about the project. Responsibilities will be delegated across the communications and program teams as required.	Document all information disclosure activities undertaken

For more information about SEP implementation, please contact [info@sparkmicrogrants.org](mailto:info@sparkmicrogrants.org).

**5.2. Resources**

Project resources allocated in support of the SEP include travel costs, and the allocated cost of project activities incorporating consultations and space for feedback. In addition, one position in the RELM team will be hired specifically for GRM/safeguards compliance.

**Indicative Budget** (*this does not include additional costs associated with management and reporting, which are separately included in Component 4 of the Project budget*):

<b>Activity:</b>	<b>Estimated Cost:</b>	<b>Timeline:</b>
1 x RELM Officer (responsible for GRM database and performance)	\$50,152	Throughout project
Local Government awareness workshops (Held at Sector offices, inclusive of District, Sector & Cell-level staff)	\$1,190	Within 60 days of project start-up
Travel costs for consultations and other meetings/visits related to grievance redress and stakeholder engagement	\$9,750	Throughout project
Printing of posters/pamphlets/other materials for information disclosure	\$500	Within 60 days of project start, and throughout project as required to address updates/changes.
<b>Total:</b>	<b>\$61,592</b>	

## 6. Grievance Redress Mechanism

Spark will implement a GRM, the purpose of which is to record and address any complaints that may arise during the implementation phase of the project and/or any future operational issues that have the potential to be designed out during the implementation phase. The GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (PAPs). The GRM works within the existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GRM are to:

- Give people affected by the project and other stakeholders safe, transparent and accessible ways of reporting any issues that are putting participants/beneficiaries at risk, and/or impacting the quality of the project;
- Record, categorize and prioritize the grievances;
- Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions);
- Forward any unresolved cases to the relevant authority.

### 6.1. Grievance Collection

The GRM will comprise a range of forums for raising complaints by beneficiaries which allow for anonymity, confidentiality, and is accessible to those without phones or the ability to write. Platforms will be provided to submit grievances at the community level, project level, and country-level, and will be advertised. They will include a toll-free phone and SMS line, regular in-person feedback sessions with project-affected persons, and facilitation of community-based grievance redress groups, and an option to email Spark directly and via the Spark website.

#### **Community-Based Grievance Redress Committees / Advisory Committee**

Communities in Rwanda have existing traditional and cultural grievance redress mechanisms which can be used to resolve some project related disputes at the community level, with some degree of involvement of and support from local leaders, Spark, and Government representatives at the Village and Cell- level.

It is expected that a number of Project-related grievances can be resolved at the Village-level, including through existing mechanisms and authorities (such the designated Abunzi<sup>3</sup>). To strengthen capacity at the village-level for safe, fair, and inclusive grievance redress, all target villages will establish an 'advisory committee' with 3+ members (minimum 1 woman). The Advisory Committee will be established at the beginning of the Project in each village. The names of the 3+ committee members

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<sup>3</sup> The abunzi are local mediators in Rwanda, who are mandated by the state as the conciliatory approach to resolve disputes, ensuring mutually acceptable solutions to the conflict. The abunzi mediators are chosen on the basis of their integrity, and they handle local cases of civil and criminal nature. Traditionally, Abunzi were men known within their communities for personal integrity and were asked to intervene in the event of conflict. Each conflicting party would choose a person considered trustworthy, known as a problem-solver, and who was unlikely to alienate either party. The purpose of this system was to settle disputes and also to reconcile the conflicting parties and restore harmony within the affected community. In 2006, the Rwandan government passed the Organic Law (No. 31/2006)<sup>12</sup> which recognises and formalizes the role of abunzi or local mediators in conflict resolution. Currently, more than 30,000 abunzi mediators operate in Rwanda at the cell level.

will be recorded in the village register. Advisory Committee members will receive training from Spark at the start of the project on their responsibilities.

Advisory Committees will provide space to raise and address issues in the project, and allow community members to address problems within their control internally. The responsibilities of the Advisory Committee are;

- To support village-level grievance handling and problem-solving
- To escalate any issues that cannot be resolved at the village-level to Spark through the other Project GRM platforms
- To advise on the use of project resources in accordance with agreed village plans and budgets
- To report back to the community on resource use and problem resolutions
- To support inclusive decision-making

Stakeholders will be informed of the GRM through:

- community meetings (including for umuganda);
- written pamphlets/brochures;
- posters and District offices;
- reference in village-level and local government partnership agreements/MoUs with Spark

The types of grievances stakeholders may raise include, but are not limited to:

- Negative impacts on communities, such as financial loss, physical harm, or loss of livelihoods from program activities;
- Social risks/concerns such as gender-based violence, exclusion from access to microgrant, impartiality of decisions-making, elite capture of resources, etc.
- Health and safety risks;
- Negative impacts on the environment such as degradation of land, water ways, and soil;
- Relocation of utilities;
- Incidences of fraud, corruption, or mismanagement; and
- Unacceptable behavior by Spark staff.

## **6.2. Documentation & Categorization**

Spark will keep records of all issues brought to their attention verbally or in writing by people affected by the project (communities or individuals) in a secure database. Spark will categorize all issues and priorities complaints and whistleblowing for priority redress. The project RELM Officer is responsible for collecting, logging and categorizing all issues submitted, and assigning actions to be taken to follow up on the issue.

## **6.3. Acknowledgement and follow-up**

All non-anonymous and/or non-confidential issues submitted will be acknowledged by Spark, and all complainants will be kept informed of status updates within the stipulated time frame.



Issue collection method:	Responsible for acknowledgement and follow-up:	Process overview:
Phone/SMS	RELM Officer	Inform the complainant at the time the complaint is received that their issues will be followed up within a specified time period. Ask if they would like to be kept updated and update the issue log accordingly with contact details and any other specifications.
Website	RELM Officer	Email response forwarding the issues to the relevant GRM Committee member, or informing the complainant of when to expect feedback/resolution.
Focus Group	Trainer	Inform the complainant at the time the complaint is received that their issues will be followed up within a specified time period. Ask if they would like to be kept updated and update the issue log accordingly with contact details and any other specifications.
Community GRM Committee	Trainer	Inform the Committee at the time the complaint is received that their issues will be followed up within a specified time period. Report back to the Committee once a resolution is reached both verbally and in a written letter.

**6.4. Redress: Verification, Investigation, Action**

Spark will address action based on policy and/or consultation and discussion as appropriate, leading to any necessary corrective actions. Responsibilities for grievance redress, investigation and action are outlined below, and will be implemented in accordance with Spark’s HR policy, Program Participant Protection Policy, Anti-Fraud Policy, and all ACE Project legal agreements.

Responsibilities for action and redress:

- Fraud management procedures (Ops/Finance) (policy-based);
- Safeguarding procedures (Ops/Program) (policy-based);
- HR procedures to address misconduct (Ops) (policy-based);
- Program quality issues - Program Director (policy-based, and/or based on discussions and program analysis as required);
- Ultimate responsibility for resolution is with the Managing Director, who is also responsible for ensuring that complaints are being resolved in a timely manner (based on reports from RELM).

Spark will make the GRM gender sensitive by appointing female staff in each district (responsible for in-person grievance collection) and allocating the time of female staff, where necessary, to inform women of the Project’s GRM and its procedures, and follow-up with any female complainants.

### **6.5. Monitoring and Evaluation**

Spark will keep record of the number and the type of complaints received and addressed, allowing for performance management of the GRM. The RELM Officer will be responsible for producing regular reports (quarterly) for senior management which include:

- Number of complaints received;
- Compliance with standards & policies (addressing within a certain time etc.);
- The issues raised and trends in these issues over time;
- Causes of grievance/feedback;
- Whether remedial actions were warranted;
- Redress actions actually provided;
- Recommendations to improve /prevent/limit recurrences.

## **7. Monitoring and Reporting**

The SEP implementation will be regularly monitored and reported on as part of overall ESMF monitoring by Spark. Monitoring will assess documented evidence of SEP activities conducted and verify them on a spot-check basis and/or where concerns arise.

### **7.1. Reporting back to stakeholder groups**

Reporting back to stakeholder groups will largely mirror the engagement activities outlined in sections 4.2 and 4.3. Specifically, regular reports will be sent to donors and central government stakeholders on implementation of the SEP. For project beneficiaries, including local government officials and village members, feedback and progress updates on the SEP will be communicated during regular 'check-ins', village meetings, and routine meetings related to project implementation. All stakeholders will always be reminded of the availability of the GRM.