



Sustainable Groundwater Management in SADC Member States Project Phase 2 (P175355)

Stakeholder Engagement Plan (SEP)

1. Introduction/Project Description

1.1. Background Context

Sustained and inclusive economic growth in the Southern African Development Community (SADC) can accelerate job creation, poverty reduction and access to basic services. However, the region faces numerous water-related challenges that threaten economic growth and sustainable livelihoods. Poverty is prevalent in the Southern Africa region, especially among female-headed households, and the current global Covid-19 pandemic has severely dampened the economic outlook. Climate change poses serious risks to the agricultural sector of Southern African countries and may depress economic growth in the region. In addition, the lack of climate resilient infrastructure and climate-proof insurance in most of these Southern African countries will likely exacerbate the risks. Among different sources of water, groundwater is especially important for building climate resilience and alleviating poverty through improving human wellbeing, livelihoods, food production, ecosystems, industries and growing cities in SADC. Despite varying dependency on groundwater across SADC Member States, groundwater usually provides a critical buffer between dry and rainy seasons.

In response to such dependency, some SADC Member States are actively integrating groundwater into their water resource management policies and laws.

The proposed project directly builds on the results of the ongoing Sustainable Groundwater Management in SADC Member States Project (P127086). The new project deepens and broadens the efforts to support the SADC Member States and Transboundary River Basin Organizations (RBOs) to operationalize advances in knowledge generation and dissemination, to institutionalize gains in the capacity at local, national and transboundary levels to manage groundwater resources sustainably and equitably as well as to develop infrastructure solutions based on broad-based and inclusive consultations that are ready to be scaled up through investment programs.

Continued support for groundwater institutional development will lead to Improved groundwater management in the SADC region at the transboundary, national and local level which contributes to improved access to water and builds resilience against climate-induced shocks for sustainable livelihoods. The theory of change is based on the expected outcomes generated from the combined activities under each of the project components. The outcomes include: improved and equitable capacity of key institutions to manage groundwater in the SADC region at the transboundary, national and local level, improved knowledge on the status of groundwater resources and improved access to water of local communities contributing to improved livelihoods, increased economic opportunities and reduced vulnerability to climate-induced

shocks that take into account the undue burden on women and other vulnerable populations.

1.2. Proposed Project Description

The proposed project builds on an ongoing long-term technical engagement with the Secretariat of the Southern African Development Community (SADC) through its regional technical Centre of Excellence, the SADC Groundwater Management Institute (SADC-GMI). The project proposes to scale up and deepen certain types of actions and engagements where the SADC-GMI has been successful in mobilizing countries around cooperative action and where countries have expressed interest and need for further engagement.

The proposed Project Development Objective (PDO) is to support the SADC Secretariat through its subsidiary, the SADC-GMI to *Develop knowledge and strengthen capacity for inclusive groundwater management in the SADC region at national and transboundary levels*. The project implementation is organised around three main components, namely:

- Component 1 – Capacity building for sustainable groundwater management (US\$ 4.8 million)
- Component 2 – Knowledge development, dissemination, and advocacy (US\$ 1.3 million)
- Component 3 – Building resilient livelihoods and inclusive groundwater management (US\$ 2.9 million)

The project invests primarily in technical aspects to support institution building, generation and dissemination of knowledge and collaboration on groundwater in the SADC region. There is no physical footprint for these investments. Strategic infrastructure is proposed under component 3 and the investments are expected to be minor. For example, investments are expected to include drilling of wells and monitoring boreholes, small sand dams and riverbank infiltration systems, hand dug wells and installation of rainfall gauges or river level gauges. The project locations for these investments are currently unknown but will be in the SADC region. Locations for investments under component 3 will be strategically selected and managed through a grant scheme; by SADC-GMI through national focal groups in the SADC countries. The activity selection will be guided and vetted in accordance with the grants manual which will reflect environmental and social due diligence required in the ESCP, ESMF and the SEP.

The project will be implemented in the 16 SADC Member States: Angola, Botswana, Comoros, Democratic Republic of Congo, Eswatini, Lesotho, Madagascar, Malawi, Mauritius, Mozambique, Namibia, Seychelles, South Africa, United Republic of Tanzania, Zambia and Zimbabwe.

The work will be delivered through regional dialogue and collaboration, where the sustainable socio-economic development in the SADC Region is the long-term goal of the program. Lessons from the existing project point to a good track record of SADC-GMI in project implementation, though the situation may be slightly different at the national and local levels within the different SADC Member States. The risk will be mitigated by exploring alternative delivery models such as involving partnerships with regional implementing partners and the private sector, to complement efforts at national level.

1.3. Technical Scope of Transboundary Water Cooperation

A key aspect foreseen in this project which also derives from the mandate of the SADC Secretariat and the SADC-GMI is to promote the conjunctive management of surface and groundwater especially in the transboundary context as provided for in the SADC Protocol on Shared Watercourses. This proposed project will therefore contribute to the regional initiatives that seek to integrate the conjunctive surface and groundwater management involving the region's 30 Transboundary Aquifers and 15 Transboundary River Basins that are variously shared by at least two SADC Member States. It is therefore anticipated that various international instruments and frameworks within the regional perspective will be applied to enhance collaboration while undertaking activities foreseen in this area of work. The map in Figure 1 below presents the geographic extent of the project activities across the SADC Member States.

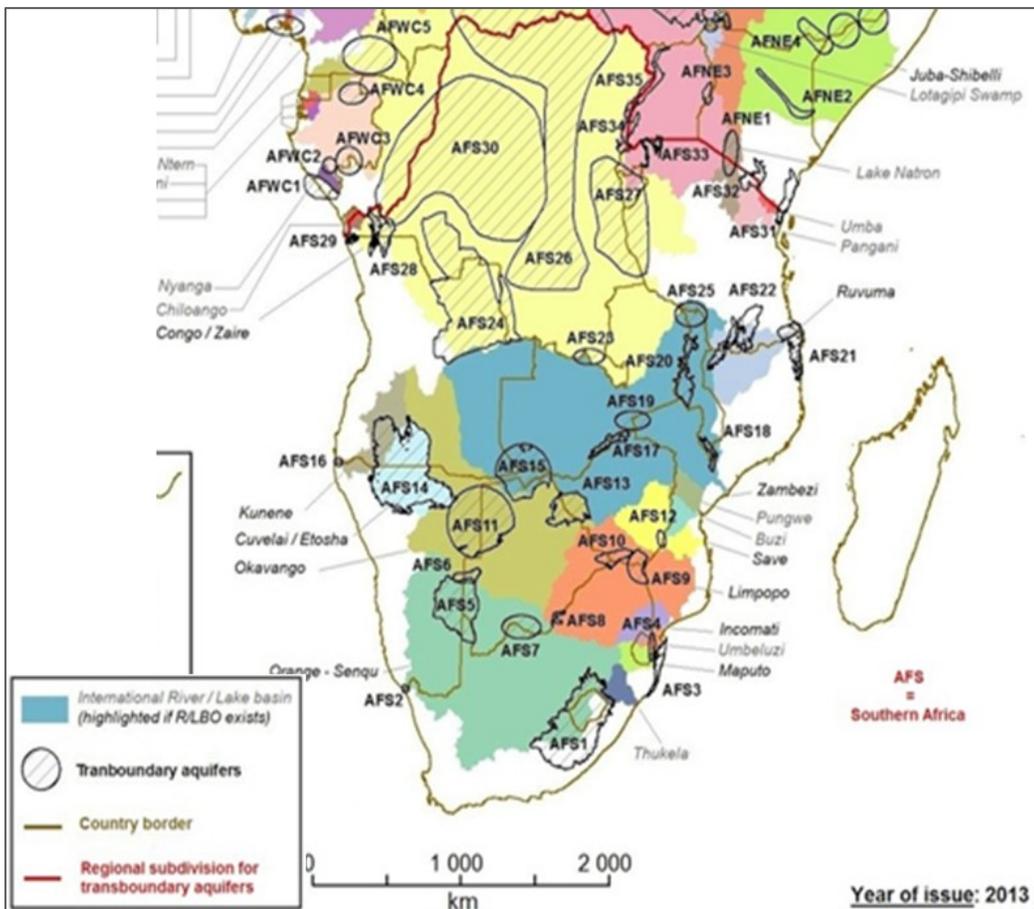


Figure 1: Indicative Map of Shared Transboundary Aquifers and River Basins in the SADC Region
Source: CGIAR

The nature of work foreseen within the TBAs and RBOs relate to undertaking research studies as well as institutional strengthening and capacity building to enhance the conjunctive use of surface and groundwater resources. Typical research studies will entail the producing Transboundary Diagnostic Analyses (TDAs) and Joint Strategic Action Plans (JSAPs) for the joint management of Transboundary Aquifers as well as for

integrating groundwater management in River Basin planning and management. Studies will also be conducted to enhance data collection and management for enhanced groundwater decision making as well as to gain better appreciate Groundwater Dependent Ecosystems and their role in supporting sustainable livelihoods at community levels.

2. Brief Summary of Previous Stakeholder Engagement Activities

As a Centre of Excellence for groundwater management in the SADC region, and as a subsidiary of the SADC Secretariat, SADC-GMI follows a formal engagement process with its stakeholders across the region where at least one meeting is held at each level annually as indicated in Figure 2 below. The same stakeholders indicated in Figure 2 will be engaged during the proposed new project.

The Stakeholder framework and mode of engagements is described in the ensuing paragraphs starting from the bottom of the chain, namely at the community level, and upwards to the SADC Council meeting of ministers. In the ongoing phase 1 project, a total of 12 community level pilot projects were implemented in 10 SADC countries. The overall guidance on how to engage the **community level stakeholders** was provided in the sub-Grant Manual that all the sub-Grantees abide by. Each sub-Grantee followed a guided process to screen the project for Environmental and Social issues that would then be compiled into an Environmental and Social Management Plan (ESMP). Within these ESMPs there were dedicated stakeholder engagement plans whose implementation the sub-grantees reported to the SADC-GMI appointed ESS framework consultant and to SADC-GMI on a monthly basis. These plans clearly identified who the stakeholders were and the nature of engagement necessary in order to ethically complete the projects satisfactorily. This process also incorporated measures to correct any inconsistencies identified as well as to address grievances arising at community level. It is expected that similar measures will be adopted for the proposed new project. Moreover, as was the case in the current ongoing project, sites for implementation of the pilot projects differ and hence the specific stakeholder engagement measures at community level will be developed at the time of identifying the projects.

The next higher level of stakeholders that were also involved in the current ongoing project are the **National Focal Groups (NFGs)**. These NFGs are comprised of a minimum of five and up to 12 stakeholders from a wide range of sectors in the respective country who have an interest in groundwater. As at this point, SADC-GMI has facilitated the establishment and operationalization of 5 such NFGs in Eswatini, Malawi, Mozambique, Namibia and Zimbabwe. In the proposed new project, SADC-GMI intends to roll out the establishment of NFGs in the remaining 11 SADC Member States. The role of the stakeholders sitting on the NFGs is well spelt out in the sub-Grant Manual especially in regards to the identification of community level projects, screening their compliance with national policies and guidelines, liaison and supervision of implementation by the sub-grantees, knowledge management as well as identification and resolution of problems and grievances from the local level. This stakeholder group includes other government ministries, academia, national level development partners, private sector, Civil Society Organisations (CSOs), Non-Governmental Organisations (NGOs), and Research Institutions. As stakeholders, they are involved in the full project cycle at local level and they also provide an interface between the local level interests and those at meso- and national level. Engagement of these stakeholders is ascertained through the regular meetings that form part of the monthly reporting on the local level

projects.

The specific government ministries and/or departments responsible for groundwater in the respective SADC Member States are both key stakeholders and beneficiaries of the project. As a stakeholder, each Member State has a National Focal Person coming from the government ministry or department responsible for groundwater. The current and future project will continue to engage each one of these important stakeholders throughout the project cycle to ensure that the project concept and activities are aligned to the national priorities. Each one of these stakeholders has direct access to SADC-GMI and the SADC-GMI regularly engages them on every aspect of the project.

Because of the regional nature of this project, **National Focal Persons** are the entry point for the project in terms of engaging the country on technical matters. The 16 NFG members from the 16 SADC Member States are collectively a stakeholder of the project as the sub-Committee on Hydrogeology which is engaged bi-annually to have their say on the project activities. Another stakeholder group which is very important are the heads of water departments (directors of water) in the respective Member States who are engaged once annually as the SADC Water Resources Technical Committee to assess the implementation of project activities and express their opinion on the alignment of the implementation in line with the regional agenda. The collective group of Water Ministers from the 16 SADC Member States is also a very important stakeholder because they oversee the alignment of the project with the regional policies, protocols and strategies. This stakeholder group is also engaged once annually. Finally, all SADC regional projects and programmes are aimed at supporting regional integration and development. The Ministers of Finance, Economic Planning and Development from the 16 SADC Member States collectively constitute a very important stakeholder called the SADC Council of Ministers that meets once annually to steer the region's development. The activities of this proposed project will therefore be of interest to all the stakeholder groups described above and illustrated in Figure 2 below.

It is important to indicate that all the stakeholder groups discussed in this section have been involved in the activities of the ongoing project and they will continue to be involved in the proposed new project.

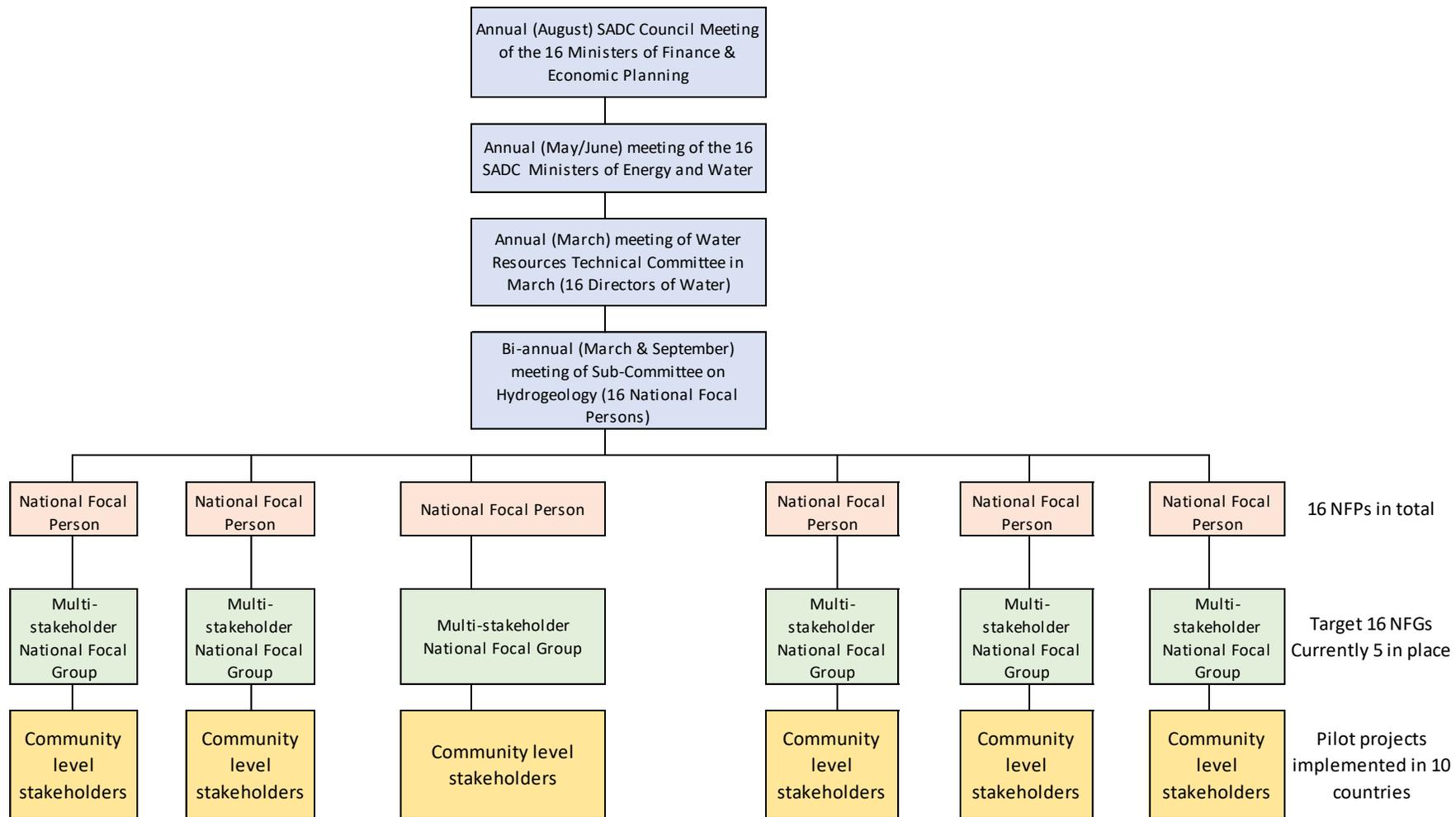


Figure 2: SADC-GMI Stakeholder Engagement framework

The latest stakeholder engagement was held on 9th October 2020 where the Concept Note of the proposed project was discussed by the Members of the Sub-Committee on Hydrogeology. Prior to the above meeting, SADC-GMI hosted a virtual disclosure workshop on 19th June 2020 attended by about 65 stakeholders from a wide range of backgrounds. The main objectives of the disclosure workshop were to:

- a. Provide feedback about the lessons learned and emerging issues in groundwater management in the SADC region arising from the implementation of the ongoing SADC SGW Project (2014-2021); and
- b. Engage key stakeholders in designing a new SADC SGW project (2021 – 2031)

During these sessions’ participants were given an opportunity to provide feedback commentary via Mentimeter, a collaborative digital tool that enables participants to comment collectively on the same topic and see a summary of the results in real time online. Furthermore, participants were able to make comments or pose to SADC-GMI and SRK experts using the Microsoft Teams chat function.

The report pertaining to this disclosure workshop is attached [Here](#) for reference.

3. Stakeholder identification and analysis

This section identifies key stakeholders who will be informed and consulted about the project, including individuals, groups, or communities that:

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

3.1. Project-Affected Parties

The programme has a SADC-wide regional footprint, but it is designed to contribute to the sustainable management of groundwater at multiple levels, ranging from regional to local. In this context the project has identified stakeholders that are affected or likely to be affected by the project at local, national, transboundary and regional level. The stakeholders that have been identified at the local level are beneficiaries and /or affected parties of Sub-grant projects and community level capacity building initiatives – these will be further assessed once the sub-projects have been identified; SADC-GMI host institution (UFS); Focal persons, focal groups members, trainees and interns; and SADC Secretariat and Secretariat structures addressing water resource management such as the Directorates for Food, Agriculture and Natural Recourses and Gender.

More specifically, Components 1 and 2 of the proposed project entail substantial analytical work and deliverables which may be conducted in the 30 Transboundary Aquifers (TBAs) and 15 Transboundary River Basins shared among the 12 Mainland SADC countries as shown in Figure 1 above. The work will necessitate some fieldwork for data collection which often requires that the consultants interact with some stakeholders on the ground. Due to the high-level engagements, the Consultants deployed by SADC-GMI often require receiving clearances to visit the project sites issued by the concerned government ministry, department or agency responsible for groundwater in consultation with any appropriate sector

institutions. The local level communities in the research areas may be classified as affected by these project activities through their involvement in data collection activities. Considering the low significance of any impacts of such activities on the local people, this group of affected parties is included as a precautionary measure in the event that some data collection may include localized drilling for collection of samples.

Under Component 3, a small sub-grants scheme will be established to provide sub-grant financing to SADC Member States for the implementation of small-scale, national level activities that will demonstrate infrastructure solutions to groundwater challenges. These are community level projects that demand national and local ownership. However, the specific location of these projects is not yet known. In order to enhance ownership, promote no-harm and enhance mutual benefits at all levels, the project will update the Sub-Grant Manual designed and reviewed in the previous project to guide the implementation of the sub-projects by the SADC Member States with supervision from the SADC-GMI and oversight from the World Bank and the SADC Secretariat structures described in Figure 2 above. The local communities in the concerned project sites may possibly become project-affected persons if the project activities induce any adverse environmental and social risks and impacts. This will be assessed during the selection and preparation of the sub-projects and locations.

The multi-stakeholder National Focal Groups are an instrumental vehicle for enhancing national and local stakeholder engagement as part of pursuing the provisions of the sub-Grant Manual.

Moreover, the proposed project activities will result in regional integration of groundwater management policies, strategies, knowledge, operational practices and monitoring networks and approaches which is a key area of interest of the SADC Secretariat.

3.2. Other interested parties

The programme has a SADC-wide regional footprint, but it is designed to contribute to the sustainable management of groundwater at multiple levels, ranging from regional to local. In this context there are many stakeholders who have different forms of interest on the project which include the national ministries, departments and agencies responsible for groundwater development and management, researchers, universities, regulators, local communities, private drilling companies, CSOs/NGOs, to name but a few. International Cooperation Partners with global, regional and national (bilateral) focus are also among interested parties to this project. These groups are likely to have an interest in the project due to the following reasons, namely, the national and transboundary level interest groups are likely to benefit from skills development through customized skills enhancement interventions (training, internship) and hands-on implementation and management experience through groundwater infrastructure pilot projects. This will be complemented by knowledge transfer to local, national and transboundary interest groups through networking engagements, conferences and workshops is also foreseen under this project. Moreover, capacity building at all levels of stakeholders through support to the technical and operational levels of groundwater management structures and institutions, through targeted capacity building initiatives (for example capacity building with national **focal groups and persons**) and the provision of technical and operational guidance in the form of customized case study work (for example in the context

of transboundary aquifer management) and management guidelines will also be of benefit throughout the SADC region.

The project will contribute to an enabling policy, legal, regulatory and institutional environment that is of key interest to many International Cooperating Partners and Development Partners to support the further development of the groundwater sector in the region by aligning regional projects to their broad-based mandates in the region. This will more specially be achieved through policy and strategy support through appropriate research, benchmarking, analysis and the development of implementation tools and roadmaps; and knowledge and information by provision of, and access to a broad spectrum of groundwater management information, knowledge and guidance made available through the SADC Groundwater Information Portal (SADC-GIP) and the Groundwater Literature Archive (SADC-GLA).

Table 1 below broadly states the project’s stakeholders at local, national and transboundary/regional level as well as whether they are direct or indirect beneficiaries of the project.

Table 1 : Project Stakeholder Categories

	Directly Impacted	Indirectly Impacted
Local	<ul style="list-style-type: none"> • Sub-grant project and community level capacity building beneficiaries and/or affected persons. • SADC-GMI host institution (UFS) 	<ul style="list-style-type: none"> • Groundwater-using communities in Member States • Groundwater professionals working at the community level • Water-User Associations
National	<ul style="list-style-type: none"> • Focal persons, focal groups members, trainees and interns 	<ul style="list-style-type: none"> • National institutions responsible for water management • National academic institutions and water research agencies • Groundwater professionals working at national level • NGOs - WaterAid, Water Mission, World Vision, Kalahari Conservation Society;
Transboundary and Regional	<ul style="list-style-type: none"> • SADC Secretariat and Secretariat structures addressing water resource management such as the Directorates for Food, Agriculture and Natural Resources and Gender 	<ul style="list-style-type: none"> • River Basin Organisations • Regional water resource management agencies • Groundwater professionals working at regional level • International Cooperating Partners and Development Partners

3.2.1 Local level direct beneficiaries – Sub-grant project and community-level capacity building beneficiaries

Following the implementation of thirteen infrastructure pilot projects in selected Member States under the

SADC GMP (2014-2021), this proposed project will continue with the implementation of innovative infrastructure projects compliant with environmental and social safeguards (ESSs), with the purpose of promoting sustainable groundwater management practices. While relatively few, these infrastructure projects will be of direct benefit to the **planners, managers, implementors and community members**, illustrating the potential of innovative approaches.

Another local-level project initiative is the development of technical and vocational skills among groundwater stakeholders. The modalities will include training and the provision of guidance materials on groundwater stewardship, and the beneficiaries will be the **local stakeholders** selected and involved such as the Water Point Committees, CBOs and the local communities.

SADC-GMI, being the project implementer will benefit from the project in several ways, including the partnership with a regional body such as the **SADC Secretariat**, association with a funded regional project, promotion and extension of its own development and water management agenda, and the opportunity for **local professionals, researchers and students** directly engaged on the project to work in a regional network and to contribute regionally.

3.2.2 Local level Indirect beneficiaries – Communities in Member States

Groundwater is the primary source of water for over 70% of the SADC rural population. Most rural communities are served from groundwater resources, with high dependence in Botswana, Malawi, Namibia, South Africa, eSwatini, Tanzania and Zimbabwe. Many towns and cities also depend substantially on groundwater, including Tshwane in South Africa, Lusaka in Zambia, Bulawayo in Zimbabwe and Dodoma in Tanzania.

Groundwater-dependent communities will therefore be indirect beneficiaries through the technical and institutional capacity support to national level institutions to improve groundwater management and the sustainability of groundwater resources.

Public and private sector groundwater professionals working at community level will be indirect programme beneficiaries, through access to knowledge, tools and network connections facilitated by the programme, and in the case of specialist consultants, through providing services to local infrastructure development and to local skills development and training.

3.2.3 National level Direct beneficiaries – Focal Persons

Under the SGM Project (2014-2021), SADC-GMI supported the establishment and operationalization of National Focal Groups (NFGs) to act as an interface between the Institute and the SADC Member States. Five National Focal Groups were successfully established in Eswatini, Malawi, Mozambique, Namibia and Zimbabwe. The establishment of these NFGs will be rolled out to the remaining 11 SADC Member States as well as capacity building of all NFGs will continue during the proposed new project. As the focal persons and focal group initiatives unfold, growing numbers of participants will be direct project beneficiaries. Further national-level direct beneficiaries will include country participants in conferences, workshops and

training, and young professionals selected and or seconded to join the regional internship programme.

3.2.4 National level Indirect beneficiaries

The Member States' national Ministries, Departments and Agencies in charge of water resources management will be the indirect beneficiaries of the Project through improved knowledge at their disposal to successfully manage the countries' water resources and through improved capacity of key institutions and their professionals, involved in national and transboundary water institutions. In addition to the ministries and agencies in the Member States, there are other institutions that SADC-GMI has supported and can further support, including:

- River Basin Organisations (RBOs) of Cuvelai River Basin Commission (CUVECOM), Limpopo River Basin Commission (LIMCOM), Orange-Senqu Basin Commission (ORASECOM), Okavango Basin Commission (OKACOM), Zambezi River Basin Commission (ZAMCOM), Pungwe, Buzi, Pungwe Save Basin (BUPUSA);
- NGOs - WaterAid, Water Mission, World Vision, Kalahari Conservation Society;
- Universities across the SADC region for internships and research opportunities;
- Institutions on the Member States' National Focal Groups.

The inhabitants, local governments and other stakeholders of the communities that benefit from infrastructure projects supported by the Project will also be direct beneficiaries of the Project's activities, through improved or more resilient water infrastructures in their communities and a more equitable and accessible service.

Finally, all citizens of regions where groundwater resources will be more sustainably and equitably managed will be indirectly benefited through improved water security and potentially less devastating impacts of weather related disasters triggered by climate change.

It is noteworthy that arrangements for water resource management are similar across most SADC Member States. Typically, they include a nationally responsible ministry and localized institutions such as water user associations. Some have water resource management agencies and most water management policies provide for catchment-based management structures. There is considerable variation among Member State institutions. Subject to country-by-country differences in participation, national water management institutions will be indirect beneficiaries of multi-faceted project efforts to build capacity, especially around the growth and institutional consolidation of groundwater management in the broader water resource management domain.

National academic institutions with an interest in the research areas such as regional water management, transboundary water resources and aquifer management, groundwater management, Climate change and climate resilience as well as the role of water in poverty reduction and socio-economic development may be beneficiaries. These stakeholder groups could use project information and knowledge resources, participate in research initiatives and use opportunities for student internships and networking. Similarly,

research agencies (such as the Water Research Commission in South Africa) will be beneficiaries if they draw on information resources, provide research services to the project, participate in regional networks and collaborate in specific research initiatives.

Universities such as the University of the Free State and the University of the Western Cape collaborated with SADC-GMI under the SADC SGM Project (2014-2021) through student internships and joint research projects. Such relationships are anticipated to continue.

Moreover, Groundwater professionals working at national level will be indirect project beneficiaries, through access to project-generated knowledge, project groundwater management tools and project networks and connections. Specialist consultants will benefit through providing services to national initiatives linked to the project, including research, support to national capacity development and support to national-level monitoring.

3.2.5 Cross boundary and regional level direct beneficiaries

The SADC Secretariat is the body that facilitates SADC projects and activities. The Secretariat is guided by the SADC mandate on regional integration and sustainable development. The Water Division and associated structures are located within the Secretariat's Directorate of Infrastructure and Services. The latter includes the Water Resources Technical Committee and the Hydrogeology Sub-Committee. The goal of the Water Division is to improve quality of life through the promotion of regional cooperation in water matters for sustainable and equitable development, proper usage, and management of water resources. The SADC Secretariat in general and Water Division in particular, will benefit from the new project in that it advances the SADC agenda and the goal of the Water Division, through a focus on groundwater management. The SADC Secretariat will benefit further through building on the achievements of the SADC-GMI and the SGM Project (2014-2021). These have built significant momentum over the project duration, with the support of the World Bank and other development partners.

3.2.6 Cross boundary and regional Indirect beneficiaries

The project will work actively with River Basin Organisations (RBOs) in the SADC Region. The established RBOs are Limpopo Watercourse Commission (LIMCOM), the Permanent Okavango River Basin Water Commission (OKACOM), the Orange-Senqu River Commission (ORASECOM), the Cuvetai Watercourse Commission (CUVECOM) and the Zambezi Watercourse Commission (ZAMCOM). Under the SGM Project (2014-2021), SADC-GMI established formal relationships with the RBOs. These institutions will continue to benefit from collaboration under these arrangements, including support with analytic tools, knowledge products, forecasting and climate risk management.

SADC-GMI has also established mutually beneficial collaborative partnerships with several regional and extra-regional groundwater water resource management programmes. These include the UNESCO Intergovernmental Hydrological Programme (UNESCO-IHP), International Water Management Institute (IWMI), the International Union for the Conservation of Nature (IUCN), Global Water Partnership Southern Africa (GWP-SA), the International Groundwater Resources Assessment Centre (IGRAC) and the African

Ministers' Council on Water (AMCOW). Similar cooperation will continue under the new project. As with groundwater professionals working nationally, professionals active at regional level benefit from the project, through access to information, tools and network connections. Consultants may benefit through the provision of services to regional research, information management, network facilitation and other SADC-wide initiatives. The new project also proposes establishing a Regional Association of Groundwater Professionals where standards of practice and matters of mutual interest to groundwater professionals in the region can be coordinated.

3.3. Disadvantaged / vulnerable individuals or groups

The regional nature of this project limits the extent to which SADC-GMI and the SADC Secretariat can directly interact with the disadvantaged / vulnerable individuals or groups in project activities. However, it is important to observe that the primary objective of Component 3 is to support community livelihoods through the sustainable access to groundwater which is depended on by an estimated 70% of the rural communities who are also vulnerable to the impacts of climate change that are aggravated by the relatively high poverty statistics. In order to enhance the participation of these vulnerable people in the project activities, a suite of instruments and checklists will be included in the sub-Grant Manual which will allow SADC-GMI to compel the Member States and their sub-Grantees to comply with the World Bank Environmental and Social Standards (ESSs) and more specifically, develop and implement project specific Stakeholder Engagement Plans in line with ESS10, as well as Gender Equality and Social Inclusion (GESI) standards. Funding will also be provided under each sub-Grant Agreement to allow the sub-Grantees and the Member States to facilitate the effective participation of the vulnerable and disadvantaged members of the communities in the geographic project areas as and when they are identified in future.

At the national level, the project will ensure that the National Focal Groups (NFGs) remain constituted in such a manner as to have representation from some of the representatives of the vulnerable groups to enhance inclusiveness. This will be complemented by SADC-GMI implementing training modules that will capacitate the NFGs to pursue all the protocols provided in the project documents and sub-Grant Manual to accommodate the participation of the vulnerable and disadvantaged people in affected by the projects.

At the much higher regional level, it is acknowledged that there are relatively limited opportunities for women and the youth to participate in the water sector, and particularly the groundwater sector. SADC-GMI has incorporated a deliberate effort to involve these disadvantaged groups by requiring nominations to training events to include women as well as running a Young Professionals internship programme. These measures were successfully implemented in the current SADC SGW project and the proposed project looks to intensify on this approach.

3.4. Summary of project stakeholder needs

Table 2: Summary of Project Stakeholder Needs

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, daytime meetings)
SADC regional level stakeholders	SADC Council of Ministers, Water & Energy Ministers, Water Resources Technical Committee, sub-Committee on Hydrogeology	Representatives from the ministries, departments and agencies from the 16 SADC Member States	English, French, Portuguese	Translated Electronic reports presented, discussed at formal meetings and also shared via email	Virtual and physical consultation meetings with translations
Transboundary Water stakeholders	River Basin Organisations & International partners	6 RBOs (CUVECOM, BUPUSA, LIMCOM, OKACOM, ORASECOM, ZAMCOM), IWMI, IGRAC, UNESCO	English, French, Portuguese	Translated Written electronic reports	Virtual and physical consultation meetings and workshops with translations
National level stakeholders	National Focal Groups (NFG), National Focal Persons (NFP)	16 multi-stakeholder NFGs and 16 NFPs representing their respective Member States	English, French, Portuguese	Translated Written electronic reports	Virtual and physical consultation meetings and workshops with translations
Local level stakeholders	Local project beneficiaries and the affected, research institutions,	Small grant project locations, data sharing, knowledge products generation & dissemination	English, French, Portuguese & local vernacular languages	Translated electronic & printed written reports, phones, internet, posters, radio	Virtual and physical consultation meetings, focus group meetings and workshops, training events, databases

4. Stakeholder Engagement Program

4.1. Purpose and timing of stakeholder engagement program

The main purpose of this SEP is to enhance ownership of the project activities by the stakeholders at all levels of implementation and throughout the project life cycle. In this regard, the following main stakeholder engagement activities are foreseen:

- a. **Project design:** Ownership of the project by the SADC Member States is a crucial prerequisite to its successful implementation. Subsequently, prior to approval of the project by the funders, the SADC Secretariat sent out letters and supporting Annexes in the form of the OP7.50 Notification to all the 16 Members of the SADC Water Resources Technical Committee in the three official SADC Languages (English, French and Portuguese) giving them until 8th March 2021 to raise any concerns. Any comments received will be incorporated in the final project design. In order to enhance the ownership of the project, negotiations on the basis of the project appraisal document have been scheduled for 15th April 2021 with the SADC Secretariat's Executive Secretary and her technical and legal team.
- b. **Project launch:** Stakeholders from the WRTC, the Sub-Committee on Hydrogeology and other already identified Regional and International cooperating partnerships will be invited to the official project launch event which is anticipated within the first 3 months of the project's effective date. These stakeholders have an interest in ensuring that the proposed project implementation and management arrangements are sufficiently aligned to their own interests. The purpose of this launch will therefore be to share information with the stakeholders on the project objectives, components, methodology, results framework and implementation modalities and to solicit inputs on the implementation plan.
- c. **Project implementation:** . During project implementation, project stakeholders at regional, transboundary, national and local levels will be engaged as described in the ensuing paragraphs.

Regional Level Stakeholders: Stakeholder groups at this level include the SADC Council of Ministers, Water & Energy Ministers, Water Resources Technical Committee and the sub-Committee on Hydrogeology. Each one of these groups comprises one representative each from the 16 SADC Member States who individually represent the interests of their respective countries, and collectively they all represent the interests of the entire SADC region. All the stakeholder groups, except the sub-Committee on Hydrogeology, are engaged once annually to evaluate and make input on the alignment of the project with the regional agenda.

Transboundary Water Level Stakeholders: In this category River Basin Organisations (RBO) and other International partners with an interest in groundwater are included. SADC-GMI has formal Memoranda of Understanding (MOU) with each one of the 5 main RBOs in the SADC region. These MOUs make provision for at least one meeting between the parties to engage on the project activities on both parties. Moreover, SADC-GMI is also assisting the RBOs to set up Groundwater Committees that should meet at least twice annually. These engagements will be opportunities to discuss project activities and get inputs from the RBO stakeholder group. As in the previous project, SADC-GMI foresees continuing to work with international transboundary institutions such as the International Water Management Institute (IWMI), International Groundwater Resources Assessment Centre (IGRAC), United Nations Education, Scientific and Cultural Organisation (UNESCO), etc. MOUs are signed with most of such

stakeholders which have a minimum provision to engage once per year.

National Level Stakeholders: National Focal Persons (NFPs) and the multi-stakeholder National Focal Groups (NFGs) are the key stakeholders at this level. NFPs are also members of the NFGs. During project implementation, NFPs will be engaged at least monthly, especially during the implementation of the small grant projects in-country. The NFPs will also be engaged biannually as members of the sub-Committee on Hydrogeology. In addition, NFPs will be engaged as required throughout the project cycle for implementing transboundary projects that involve their respective Member State. NFGs are critical at the point of identifying and screening national projects for funding through the sub-Grant scheme. The timing of such engagement is dependent on when the grants are announced and when the concerned Member States respond. Beyond such point, the NFG will continue to be engaged at least quarterly when project supervision and support visits are conducted by SADC-GMI to the respective Member State.

Local Level Stakeholders: Community level stakeholders will directly be engaged through their representatives when SADC-GMI project team members visit subgrant project sites in the Member States. The timing of such visits is not known in advance, but the experience from the ongoing project averaged the frequency at quarterly. More frequent engagement will be conducted by the sub-grantees as stipulated in the sub-grant manual which outlines the necessary consultation requirements at the different stages of the sub-project cycle in a transparent and effective manner from formulation, evaluation, implementation and monitoring, as well as reporting on the results. A requirement will be made in the sub-Grant Manual for sub-grantees to develop and implement project specific SEPs and these SEPs will have a more detailed identification and analysis of the affected parties at the project/community level. The SEP shall allow for meaningful consultation in a participatory manner and should be tailored to ensure involvement of disadvantage and vulnerable groups in the communities.

4.2. Proposed strategy for information disclosure

The fact that this project is implemented across the expansive SADC region, the bulk of the activities necessitating disclosure involve high level stakeholder engagement through reports and powerpoint presentations shared either in electronic form via email or the website and via workshops. This is mostly relevant for activities implemented at transboundary and at regional level. However, in the case of the implementation of the sub-grant innovative pilot projects at community levels, the SADC-GMI's responsibilities for disclosure are channeled through national level structures such as the Multi-stakeholder National Focal Groups where the country's National Focal Person plays an instrumental role to coordinate.

In order to ensure that sub-Grantees are sufficiently engaging at the community level where there may be affected persons from project activities, SADC-GMI will oblige all sub-Grantees to include an Information Disclosure strategy as part of their project proposals. These plans will subsequently be approved in advance and included as an Annexure to the Sub-Grant Agreement signed with the sub-Grantee. The implementation of such a strategy will be monitored at least quarterly as part of progress reporting for the implementation of the sub-grant project.

Table 4: Proposed Information Disclosure Strategy

Project stage	List of information to be disclosed	Methods proposed	Timetable: Locations/ dates	Target stakeholders	Percentage reached	Responsibilities
Project Design	-Project Concept -International waters impacts - Key elements of the ESMF and SEP including GRM	Letter to 16 WRTC Members with Annexes SADC-GMI website	8 February 2021	16 SADC Member State ministries responsible for GW	Letter reached 100%	SADC Sec / SADC-GMI
Project launch	- Project Information - Project Implementation modalities - Key elements of the ESMF and SEP including GRM	- Present Project Appraisal Document & key E&S elements - Present Project Implementation Plan - SADC-GMI website	Launch workshop within 3months after effectiveness date	All SADC-GMI stakeholders on SADC-GMI database at national, regional &internationally	Targeted Email with brochure – 100% Website-30% Powerpoint presentation-100% at workshop	SADC-GMI/ SADC Secretariat
Sub-Grant Manual	Approval of Sub-Grant Manual	Share copy of Sub-Grant & make Power-point Presentation	Dissemination of documents & host consultation workshop within 6 months of project effectiveness	16 Members of the Project Steering Committee	Targeted Email containing Sub-grant Manual – 100% Powerpoint presentation –	SADC-GMI
Project Implementation	Project Financial and Physical progress monitoring	1-M&E report 2-Financial Report 3-Physical Activity Report	-Quarter SADC-GMI Board meetings -Biannual PSC meetings	10 SADC-GMI Board Members 16 PSC Members	Electronic reports – 100% Online M&E platform – 20%	SADC-GMI

Sub-Grant Scheme	Qualifying Innovative sub-grant pilot projects selected for implementation in Member States	1-Call for proposals	Publication calling for proposals in line with sub-Grant Manual starting from month 9 after project effectiveness	Members of the 16 Multi-stakeholder National Focal Groups (NFG) 16 PSC Members	Targeted Emails containing advert – 100% Website – 40%	SADC-GMI / NFG /PSC Members
Sub-Grant Scheme	E&S Compliance, financial & physical progress disclosure	- Environmental & Social Compliance reports -Physical& Financial performance reports	Quarterly reports	All stakeholders in Member States, NFG Members, Beneficiary Communities	Newsletters- 80% Workshops -60%	NFGs / SADC-GMI

4.3. Proposed strategy for consultation

As indicated in the Table 5 below, the main strategies for stakeholder consultations for this regional project are workshops, meetings, email and the SADC-GMI website

Table 5: Strategies for Stakeholder Consultations

Project stage	Topic of consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibilities
Project Design	Identification of concerns on project concept ESMF & SEP	Letter soliciting feedback Disclosure on website	Email delivery on 8 th February 2021	16 SADC Member States' WRTC members	SADC Sec Water Division Snr Prog. Officer, SADC-GMI Exec
Project launch	Implementation Plan ESMF & SEP	Consultation Workshop	Virtual within 3 months after effectiveness date	All project stakeholders	SADC-GMI Communications Expert/ Executive
Sub-Grant Manual	Approval of Sub-Grant Manual	Consultation workshop	Virtual within 6 months after effectiveness date	16 Members of the Project Steering Committee	SADC-GMI Communications Expert/ Grants Expert
Sub-project preparation	Potential Environmental and Social risks and impacts & proposed	Virtual and physical consultation meetings, focus group	Project Area During sub-project preparation, implementation &	Community level stakeholders/Affected Persons	Sub-Grantees
Project Implementation	Progress Monitoring	Meetings, dissemination of reports	Quarterly & Biannual meetings	10 SADC-GMI Board Members & 16 PSC Members; communities & affected persons	SADC-GMI Exec Dir/ Communications Specialist; NFP & sub-grantee
Sub-Grant Scheme	Qualifying innovative projects selection	Email notifications & Website advert	Month 9 after project effectiveness	Members of the 16 NFGs, 16 PSC Members; local authorities, communities &	Grants Expert/SADC-GMI Exec Director
Sub-Grant Scheme	Compliance & progress reporting	Email & meetings; dissemination of reports	Quarterly	All stakeholders in Member States, NFGs, Beneficiary Communities	Grants Expert/SADC-GMI Exec Director

4.4. Consultations and Stakeholder Engagement when there are constraints on conducting public meetings

The foreseen level of consultations elaborated in the table above demonstrate the regional and relatively high-level nature of engagements which can be managed relatively easily without physical contact especially in time of pandemics like the ongoing COVID-19. It is however acknowledged that the success of the project at regional level will heavily rely on successful engagements with stakeholders from the Member States who

experience various impacts of pandemics. The following guidelines drawn from the “Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” are relevant for consideration during this COVID-19 pandemic and during project implementation:

- Review the country COVID-19 spread situation in the project area, and the restrictions put in place by the government to contain virus spread;
- Review the draft Stakeholder Engagement Plan (SEP, if it exists) or other agreed stakeholder engagement arrangements, particularly the approach, methods and forms of engagement proposed, and assess the associated potential risks of virus transmission in conducting various engagement activities;
- Be sure that all task team and PIU members articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings, and minimize direct interaction between project agencies and beneficiaries / affected people;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including webex, zoom and skype meetings;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, public announcements and mail) when stakeholders do not have access to online channels or do not use them frequently. Such channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Employ online communication tools to design virtual workshops in situations where large meetings and workshops are essential, given the preparatory stage of the project. Webex, Skype, and in low ICT capacity situations, audio meetings, can be effective tools to design virtual workshops. The format of such workshops could include the following steps:
 - a. *Virtual registration of participants*: Participants can register online through a dedicated platform.
 - b. *Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics*: These can be distributed online to participants.
 - c. *Review of distributed information materials*: Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.
 - d. *Discussion, feedback collection and sharing*:
 - ✓ Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this.

- ✓ Group, team and table discussions can be organized through social media means, such as webex, skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.
- e. *Conclusion and summary:* The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions and share electronically with all participants.
- In situations where online interaction is challenging, information can be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp groups, Project weblinks/ websites, and traditional means of communications (TV, newspaper, radio, phone calls and mails with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.
- *Engagement with direct stakeholders for household surveys:* There may be planning activities that require direct stakeholder engagement, particularly in the field. One example is resettlement planning where surveys need to be conducted to ascertain socioeconomic status of affected people, take inventory of their affected assets, and facilitate discussions related to relocation and livelihood planning. Such survey activities require active participation of local stakeholders, particularly the potentially adversely affected communities. However, there may be situations involving indigenous communities, or other communities that may not have access to the digital platforms or means of communication, teams should develop specially tailored stakeholder engagement approaches that will be appropriate in the specific setting.
- *In situations where it is determined that meaningful consultations that are critical to the conduct of a specific project activity cannot be conducted in spite of all reasonable efforts on the part of the sub-grantee, SADC-GMI shall discuss with the sub-grantee whether the proposed project activities can be postponed by a few weeks in view of the virus spread risks. This would depend on the COVID-19 situation in the country, and the government policy requirements to contain the virus spread.*

4.5. Proposed strategy to incorporate the view of vulnerable groups

The participation of vulnerable people in the project activities at local level is facilitated through the inclusion of compulsory criteria in the sub-Grant Manual which will allow SADC-GMI to compel the Member States and their sub-Grantees to comply with Environmental and Social Safeguards (ESS), as well as Gender Equality and Social Inclusion (GESI) standards. Funding will also be provided under each sub-Grant Agreement to allow the sub-Grantees and the Member States to facilitate the effective participation of the vulnerable and disadvantaged members of the communities in the geographic project areas as and when they are identified in the future. The sub-grantees' monthly progress reports are specifically reviewed by SADC-GMI to verify and enforce the participation of the vulnerable people in the project areas.

At the respective Member States' national level, the project will ensure that the National Focal Groups (NFGs) representation also comes from some of the vulnerable groups to enhance inclusiveness. Moreover, training modules will be delivered to enable the NFGs to include vulnerable and disadvantaged people within the context of implementing the sub-Grant projects and other project initiatives.

In order to address the disparity in the limited presence and activity of the youth and women in the

groundwater field to contribute more to this project, SADC-GMI will implement deliberate strategies to involve these disadvantaged groups by requiring nominations to training events to include women as well as running a Young Professionals internship programme.

4.6. Timelines

The table 6 below summarizes the timelines for the project phases discussed in the preceding sections, key decisions sought, and deadlines set for comments.

Table 6: Timelines for the Project Phases

Project stage	Due Date	Key Decisions Sought	Deadlines for Comments
Project Design	8 th February 2021	Identification of concerns on project concept Inputs on draft ESMF and SEP	8 th March 2021
Project launch	Within 3 months after effectiveness date	Inputs on Draft Implementation Plan Inputs on draft ESMF and SEP	During the Consultation Workshop
Sub-Grant Manual	Within 6 months after effectiveness date	Contributions and Approval of Sub-Grant Manual	During Consultation workshop
Project Implementation	Quarterly & Biannual	Successful Progress Monitoring Compliance with E&S requirements	During Meetings through Agenda and Action items
Sub-Grant Scheme projects identification	Month 9 after project effectiveness	Qualifying innovative projects selected	Deadline at least 30 days after first Email notifications & Website adverts
Sub-Grant Scheme implementation	Quarterly	Compliance & progress reporting	15 Days after end of Quarter for receipt of reports & at meetings held 30 days after end of quarter

4.7. Review of Comments

The predominant mode of gathering comments under this project is at formal meetings and workshops where stakeholders will be engaged using various participatory methods to solicit their feedback. In these environments, it is acknowledged that not everyone is comfortable speaking in big gatherings and therefore, in addition to small focus group discussions, individual views will be sought using cards to capture all views. For every workshop or meeting that SADC-GMI organizes, there is always an Evaluation process run to allow all participants to independently, and often anonymously provide feedback on the subject matter.

Contributions gathered during meeting/workshop proceedings are discussed and the resultant action points captured as agreed action point in the minutes and reports of the said event. Comments received from the post-meeting/workshop evaluations are also captured in the minutes and/or reports for the attention of

SADC-GMI. Agreed Action items captured in minutes and event proceedings are reviewed at subsequent events and they will only be removed from the minutes/proceedings once they are fully and satisfactorily addressed.

As one of its performance indicators, SADC-GMI is assessed on the progressive level of satisfaction by participants to SADC-GMI events. This compels deliberate efforts to satisfactorily address all comments considering that the stakeholder group remains more or less the same throughout the duration of the project.

SADC-GMI also has on its website an inquiries and general information email address info@sadc-gmi.org where stakeholders and any interested parties can send their comments. This email is checked at least twice a week by the SADC-GMI Communications and Knowledge Management Specialist who will direct the comments to the relevant thematic area managers for attention, keeping the Executive Director in copy.

4.8. Future Phases of Project

The foregoing sections of this plan stated the minimum frequency for engaging stakeholders as quarterly, unless it is a once-off activity. However, it is fully acknowledged that engagements at local level during the implementation of the pilot projects needs to be more frequent in order to maintain a level of confidence in Member States’ compliance to Environmental and Social Safeguard provisions onsite. Provision was therefore made in the sub-Grant Manual for sub-Grantees and Member States to report monthly including the status of the implementation of their project specific Stakeholder Engagement Plans (SEP).

It is however here noted that 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.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

An adequate budget has been allocated under all the three components of this project to fully implement all the foreseen activities of this SEP. Contact information in Table 7 below is provided as part of implementing this SEP to allow people with comments or questions about the project or the consultation processes.

Table 7: Contact Information for Implementing this SEP

Titles of Persons Responsible	SADC-GMI Communications & Knowledge Management Specialist	SADC-GMI Executive Director
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Contact Details	University of the Free State IGS Building P.O. Box 339 Bloemfontein, 9300 South Africa Tel: +27 51 403 7722 (office) +27 62 425 3942 (mobile) Email: thokozani@sadc-gmi.org	University of the Free State IGS Building P.O. Box 339 Bloemfontein, 9300 South Africa Tel: +27 51 403 7498 (office) +27 71 773 6430 (mobile) Email: jamess@sadc-gmi.org
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5.2. Management functions and responsibilities

Regional Level

The implementing entity, SADC-GMI has adequate internal capacity to implement the provisions of this SEP. From a human resources perspective, SADC-GMI has on its core team a Communications and Knowledge Management Specialist who holds a BA Degree majoring in Communications Science, Industrial Psychology and Political Science. He has more than 17 years working experience of which 4 were with SADC-GMI performing the following key functions:

1. Coordinate all communication for multi-stakeholder events hosted or attended by SADC-GMI including relevant brand awareness activities;
2. Serve as the focal point for all external communication;
3. Responsibility for the production and distribution of branding and awareness materials including diaries, calendars, clothing, etc.;
4. Organization of the annual SADC Groundwater Conferences;
5. Support the building of a platform and networks of cooperation and knowledge-sharing, connecting stakeholders such as experts, decision-makers, and representatives from groundwater-dependent sectors as well as international groundwater agencies;
6. Serving as key expert for awareness raising, knowledge management and communication involving activities to inform, engage and maintain dialogue with key stakeholders at all levels;
7. Liaison with the M&E Consultant to keep the content on the website up to date;
8. Lead the implementation of the Awareness, Knowledge Management and Communications Strategy (2018 - 2023);
9. Facilitate the documentation of the ongoing projects through filming, photographing and writing stories and disseminating the products as necessary.

The Communications and Knowledge Management Specialist (CKMS) will therefore be at the core of driving all stakeholder engagement activities identified in this SEP. It is noteworthy that as part of developing the Awareness, Knowledge Management and Communications Strategy (2018-2023), SADC-GMI also developed a stakeholders' database that is relevant for the furtherance of the objectives of this SEP.

In addition to the CKMS, SADC-GMI will also have on the Project Implementation Unit, an Environmental & Social Safeguards specialist who will ensure that appropriate SEP processes are followed especially during implementation of the sub-Grant projects in the Member States.

Country Level

The National Focal Persons (NFPs) and the multi-stakeholder National Focal Groups (NFGs) will assume significant responsibilities in ensuring that the sub-grantees are sufficiently engaging and consulting all the necessary community level stakeholders throughout the project cycle from the identification through to the implementation and commissioning of sub-grant projects and allocate sufficient resources (human & budget) for these activities. In order to facilitate this role for the NFPs and NFGs, SADC-GMI will require each sub-Grantee to develop a Stakeholder Engagement Plan (SEP) which will be approved in advance and included as an Annexure to the Sub-Grant Agreement signed with the sub-Grantee. Sub-grantees must continue to conduct stakeholder engagement in accordance with their project specific SEP and provide information to stakeholders throughout the life cycle of the project. Once consultations have taken place, stakeholders will want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, project impacts are being monitored. Therefore, sub-grantees will have to report back on the potential risks and impacts of the project. If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact on stakeholders, sub-grantees will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated. The implementation of the project level SEP will be monitored at least quarterly as part of progress reporting for the implementation of the sub-grant project.

6. Grievance Escalation and Redress Mechanism

The figure below summarizes the grievance escalation and redress mechanism available for use under this project.

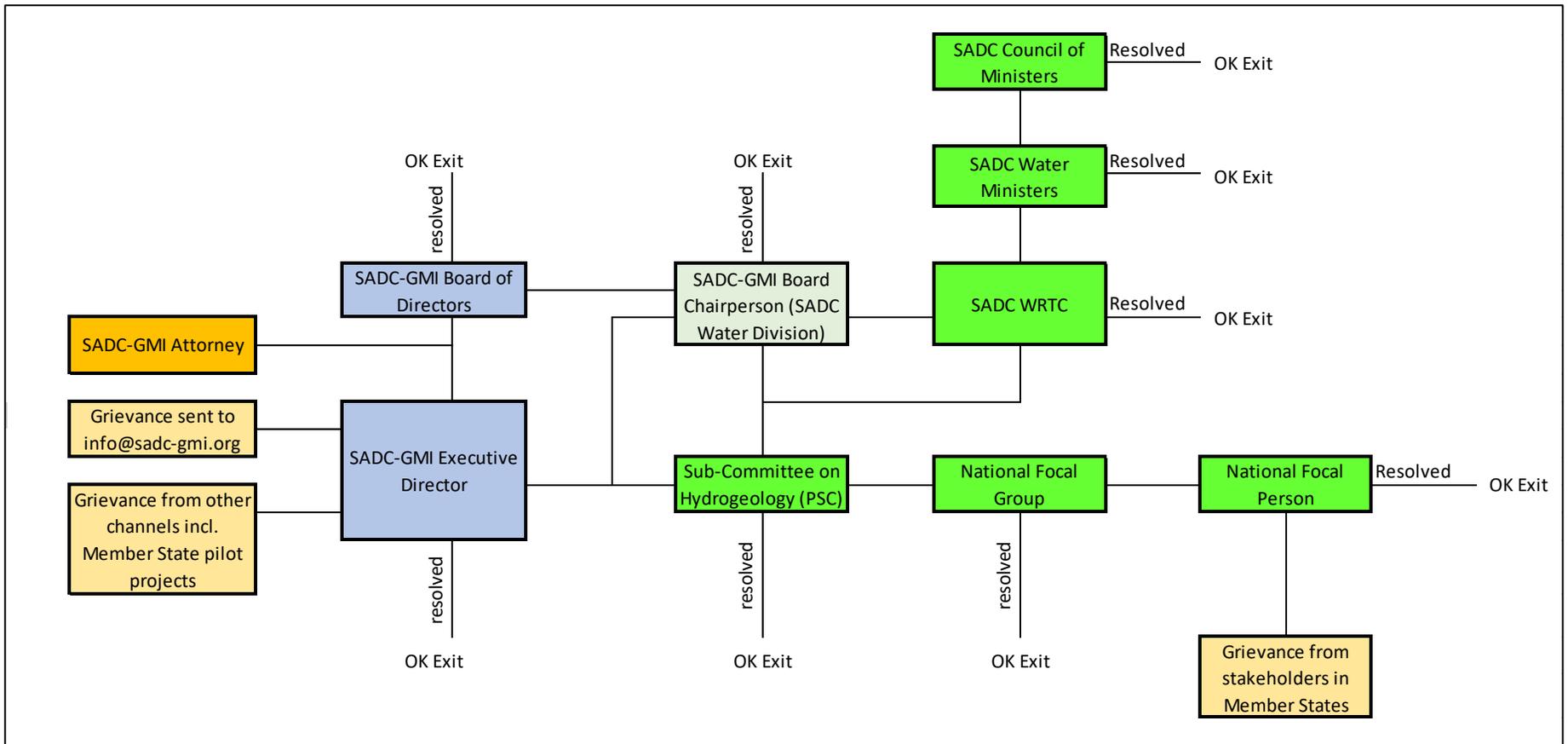


Figure 3: SADC Grievance Escalation & Redress Framework

This illustration assumes that the grievance has not been resolved at local level and it has already escalated to institutional level. There are 4 entry points for grievances into the SADC-GMI system as illustrated above.

It is noteworthy that the GRM elaborated in this SEP pertains to grievances that spill over beyond country level because project specific GRMs will be established at country level to resolve grievances arising from the implementation of the pilot projects. This explains why the entry level for grievances as indicated in Figure 3 is either the National Focal Person and/or the Executive Director.

6.1. Regional-level grievance resolution process

Grievances arising out of the normal implementation of project activities that cannot be resolved at activity level may be escalated to the SADC-GMI Executive Director (ED) via his email address or the info@sadc-gmi.org email address or by any other available means to the aggrieved. If the grievance cannot be resolved by the ED, it can be referred to the SADC Secretariat through the Water Division which is the grant recipient. A referral in this case can be equated to an appeal process where the aggrieved opts to escalate the issue. The Senior Programme Officer (SPO) in the SADC Secretariat's Water Division is also the Chairperson of the SADC-GMI Board of Directors. Depending on the nature of the grievance, the SPO can also use the mechanisms within the SADC Secretariat to resolve the problem, or refer it to the SADC Water Resources Technical Committee (WRTC) which has its own escalation channels that include the Water Ministers' and Council of Ministers' meetings respectively.

The ED also has the option to escalate the grievance to the SADC-GMI Board of Directors who may successfully resolve the issue, or also refer it to the SADC structures through the SPO who chairs the SADC-GMI Board of Directors. The ED and the SADC-GMI Board of Directors also have access to legal advice and resource through the company's Attorneys who, at each and every Board of Directors' quarterly meeting, submit a declaration whether there are any cases that they defended for or against SADC-GMI during the preceding reporting period. By implication, the company attorneys are also available as a mechanism to resolve grievances that may be brought against the project at any point.

SADC-GMI will maintain a database of all incoming grievances and how they have been resolved. All incoming grievances will be acknowledged to the originator within 48 hours after they are received with an indication of a roadmap of when and how the grievance will be resolved. In addition, and as a matter of policy, all grievances and how they will have been handled in any reporting period will form part of the quarterly and biannual meetings of the SADC-GMI Board of Directors and sub-Committee on Hydrology respectively with the option to escalate to the higher level structures. Feedback to the concerned parties raising the grievances will be reported back to them directly from SADC-GMI and through the Members of both the Board of Directors and the sub-Committee on Hydrogeology based on the meetings' minutes.

6.2. Country-level grievances resolution process

Grievances may also emerge from the implementation of pilot projects in the Member States. Should these not be resolved amicably at grassroots level, they can be escalated to the National Focal Person (NFP) within the respective country. Should the grievance not be resolved at NFP level, it can be referred to the National

Focal Group (NFG) who, upon failure can also escalate it to the WRTC through the NFP and then the remaining SADC structures coded in green will be followed up to the Council of Ministers.

It may be noted that within each country, the NFP and NFG have access to national mechanisms to resolve any grievance before escalating it to beyond its borders. Moreover, the entire grievance escalation and redress mechanism as presented here is founded on principles of negotiation and diplomacy and as a result it is not expected that any issue will spill beyond the SADC Council of Ministers. Based on the principles of negotiation and diplomacy, the linkages indicated above are not rigid uni-directional hierarchies. This means negotiations can occur in both directions. Furthermore, although the Grievance mechanism looks quite complex and extensive, normal practice in regional projects is not known for using any of the measures beyond those that are available at project manager (ED) level.

7. Sexual Exploitation and Abuse and Sexual Harassment Complaints

For the purpose of the SADC-GMI GRM, the following terms are defined as:

- **Sexual exploitation** is understood as any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).¹
- **Sexual abuse** is understood as actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5).²
- **Sexual harassment (SH)** is understood as any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature.³

With respect to complaints relating to sexual exploitation or abuse (SEA) and sexual harassment (SH), because of the risk of stigma, reprisals and rejection that can be associated, it is very important for GRM to put in place a separate channel that can ensure grievances are registered, recorded and handled in a safe, anonymous and confidential manner. This channel needs to balance the need to be survivor-centered while ensuring due process by considering the alleged perpetrators' rights to privacy and presumption of innocence. Global best practice recognizes that it is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs and wishes are prioritized in every decision related to the incident. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's consent.

¹ Also see World Bank Good Practice Note, Environmental & Social Framework for IPF Operations Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works, Second Edition, February 2020.

² Ibid

³ Ibid.

The specific sub-project will set out an Accountability and Response Framework⁴ which details how allegations of SEA/SH will be handled (investigation procedures) and disciplinary action for violation of the codes of conduct (CoC) by workers. The Accountability and Response Framework should include at a minimum:

- How allegations will be handled, in what timeframe, and the range of possible disciplinary actions for violation of the CoC by workers, taking account of due process;
- Procedures to report SEA/SH allegations internally for case accountability;
- A referral pathway to refer survivors to appropriate support services; and
- Procedures that clearly lay out confidentiality requirements for dealing with cases.

For SEA/SH, the GRM should primarily serve to: (i) refer complainants to the GBV service provider;⁵ and (ii) record resolution of the complaint.

7.1. Sexual Exploitation and Abuse and Sexual Harassment Procedure

When a SEA or SH type grievance is submitted, measures set out in the Accountability and Response Framework should be applied and GBV focal person in the GRM at the SADC-GMI central level or project level (in those projects where a focal person is hired) who is trained in managing SEA and SH type grievances should handle the complaint.

It is therefore essential that prior to SEA/SH complaints being received, all projects clearly identify who specifically will be responsible for handling the complaint: who will assess the nature of the complaint, the appropriate sanction to be applied to the perpetrator, confirmation that the survivor has received support, and that sanctions have been enacted, etc. If projects are unable to train or hire a GBV focal person, they should at minimum train persons in the complaint uptake channels on how to appropriately and confidentially record complaints in line with the principles set out herein and subsequently immediately refer the same to the GBV focal person at the SADC-GMI central level.

When the complaint is received, the procedures set out in under Section 6. Grievance Process should be adapted to ensure the following:

1. Confidentiality of Information: Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security. No identifiable information on the survivor should be

⁴ The Accountability and Response Framework is recommended for all projects, while the SEA/SH Prevention and Response Action Plan is recommended for Moderate, Substantial and High-risk projects. The SEA/SH Prevention and Response Action Plan outlines how the project will put in place the necessary protocols and mechanisms to minimize the risk of exacerbating SEA/SH in the project, as well as to address any SEA/SH issues that may arise. Sample SEA/SH Prevention and Response Action Plans and other materials to support implementing the recommendations are available at:

<https://worldbankgroup.sharepoint.com/sites/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx>

⁵ GBV service providers can be an NGO, community-based organizations or other organizations that are able to support the project in addressing any case of SEA/SH, while also working to proactively prevent such cases. It is any agency that provides services to respond to sexual exploitation, abuse and harassment, including clinical care and counselling. Specific guidance on how to find and select GBV service providers is available at the World Bank.

stored in the GRM database. The GRM should not ask for, or record, information on more than the following related to the SEA/SH allegation:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
 - If, to the best of the survivor's knowledge, the perpetrator was associated with the project;
 - If possible, the age and sex of the survivor; and
 - If possible, information on whether the survivor was referred to services.
2. After recording the above information, the complaint should be referred to the GRM GBV focal person should provide survivors with immediate information regarding options for reporting and responding including referral to existing GBV service providers.⁶ No attempt should be made by GRM GBV focal person to investigate the complaint. It is to be accepted and immediate referral should be provided to GBV service providers.
 3. The GRM should have in place processes to immediately notify both the Implementing Agency (IA) and the World Bank of any SEA/SH complaints, with the consent of the survivor. For World Bank reporting protocol refer to the Environmental and Social Incident Response Toolkit (ESIRT).
 4. The decision of reporting to the GRM and whether or not to access services should be at the discretion of the survivor based on the information provided. Thus, if the survivor simply wants to access services and not file a formal complaint, this should also be accepted.
 5. When determining GBV service providers, considerations should be given to organizations that can provide support to: (i) health; (ii) psychosocial; and (iii) legal support. Services should follow global standards and guidelines.
 6. Any survivor reporting GBV through a reporting mechanism in a World Bank Investment Project Financing (IPF) should receive care regardless of whether the perpetrator is known to be associated with the project or not. This is because often, the specifics of the perpetrator may not be known at the time that support services start, and once started, a survivor should be able to continue to access care.⁷

7.2. Processing, Resolving and Closure of Grievance

Processing, Resolving and Closure of Grievance should be adapted in the case of SEA/SH type grievances keeping in mind the following:

1. As described earlier, when a complaint is received, it is registered in the project GRM and referred to the GBV focal person at the SAPP or project level and subsequently to the relevant GBV service provider with the consent of the complainant. The service provider initiates accountability

⁶ Data Sharing: The GBV service provider should have its own case management process to gather the necessary detailed data to support the complainant and facilitate resolution of the case referred by the GRM operator. The GBV service provider should enter into an information-sharing protocol with the GRM operator to close the case. This information should not go beyond the resolution of the incident, the date the incident was resolved, and the closing of the case. Service providers are under no obligation to provide case data to anyone without the survivor's consent. If the survivor consents to case data being shared the service provider can share information when and if doing so is safe, meaning the sharing of data will not put the survivor or service provider at risk for experiencing more violence. For more information on GBV data sharing see: <http://www.gbvims.com/gbvims-tools/isp/>.

⁷ The increased SEA/SH sensitization activities linked to Bank-financed projects in the communities adjoining the project may lead survivors in these communities to seek services through the project, regardless of whether the perpetrator was linked to the project or not.

proceedings with the survivor's consent. If the survivor does not wish to place an official complaint with the employer, the complaint is closed. When the survivor proceeds with the complaint, the case is reviewed through the established SEA/SH resolution mechanism that will be developed at the sub-project level and a course of action is agreed upon; the appropriate party who employs the perpetrator (i.e., the contractor, consultant, or IA) takes the agreed disciplinary action in accordance with local legislation, the employment contract and the codes of conduct. Within the established SEA/SH resolution mechanism, it is confirmed that the action is appropriate, and the GRM is then informed that the case is closed.

2. With regard to the support given to the survivor by the GBV service provider, under the survivor-centered approach the case is only closed when the survivor no longer requires support.
3. All SEA/SH survivors who come forward before the project's closing date should be referred immediately to the GBV service provider for health, psychosocial and legal support. If a project is likely to close with SEA/SH cases still open, prior to closing the project appropriate arrangements should be made with the GBV service provider to ensure that there are resources to support the survivor for an appropriate time after the project has closed, and at a minimum for two years from the time such support was initiated. Funding for this cannot be provided by the project after the closing date, so other arrangements will need to be made, such as financing by the Borrower, involving other projects within the portfolio that may have aligned objectives and budget flexibility—or in extreme circumstances the project closing date may need to be extended.

8. WB's Grievance Redress Service (GRS)

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

9. Monitoring and Reporting

9.1. Involvement of stakeholders in monitoring activities

This project has a Project Results Framework with indicators for monitoring progress. The results framework is structured to mainstream the implementation of the SEP which should reflect in the type of results indicators at PDO, and Output levels. The tracking of indicators is included in the project's Monitoring and Evaluation (M&E) framework that is managed on a day-to-day basis by an M&E Consultant paid through the project.

The collection of data for monitoring of indicators is the responsibility of the M&E Consultant. However, he will develop various online and physical tools to gather the data from all stakeholders as required by the indicator. No aspect of the monitoring of the implementation of the SEP will be delegated.

The specific role of stakeholders will be their individual or institutional contribution to responding to questionnaires and/or polls of their satisfaction levels with certain aspects required in the SEP implementation. They will also contribute through reviewing of agreed action items from meetings and workshops as a measure for compliance with the SEP provisions.

9.2. Reporting back to stakeholder groups

Results of stakeholder engagement activities will be reported back to both affected stakeholders and broader stakeholder groups at various platforms. At regional level, these results will constitute the reporting that will go to the Quarterly SADC-GMI Board of Directors' meeting as well as the Bi-annual meetings of the sub-Committee on Hydrogeology that serves as the Project Steering Committee. This scenario obtains because at all the above meetings, SADC-GMI has a standing agenda item to report on all aspects of the project implementation.

SADC-GMI also has a project website (www.sadc-gmi.org) where project activities, including stakeholder engagement activities, are regularly posted as soon as they happen. Moreover, SADC-GMI also has a quarterly Newsletter, 'The Well', where all newsworthy activities are captured, with special attention to the activities involving project stakeholders. The Communications and Knowledge Management Specialist leads the production of this 'The Well' which is invariably populated with strategic stakeholder engagement articles from across the SADC region. It is SADC-GMI policy to include the email: info@sadc-gmi.org on all publications in case someone has queries or grievances that they want addressed.