East African Community

Eastern Africa Regional Digital Integration Project (EA-RDIP) (P176181)

STAKEHOLDER ENGAGEMENT PLAN (SEP)

11 January 2023

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ABBREVIATION AND ACRONYM

AfCFTA	African Continental Free Trade Area
CAK	Competition Authority of Kenya
CEO	Chief Executive Officer
CSO	Civil Society Organization
EAC	East African Community
EACJ	East Africa Court of Justice
EACO	East African Communication Organization
EALA	East African Legislative Assembly
EA RDIP	Eastern Africa Regional Digital Integration Project
E&S	Environmental & Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
FGD	Focus Group Discussion
FM	Financial Management
GBV	Gender Based Violence
GDP	Gross Domestic Product
GIZ	Gesellschaft für Technische Zusammenarbeit
GRM	Grievance Redress Mechanism
ICT	Information and Communications Technology
IEC	Information Education Communication
IGAD	Intergovernmental Authority on Development
M&E	Monitoring & Evaluation
MICT&PS	Ministry of Information, Communications Technology and Postal Services
MoFP	Ministry of Finance and Planning
NCSA	National Cyber Security Authority

NCA	National Communications Authority
NIDA	National Identification Agency
NITA-U	National Information Technology Authority – Uganda
OBR	Burundian Revenue Authority
ODPC	Office of the Data Protection Commissioner
OIP	Other Interested Party
PAP	Project Affected Person
PDO	Project Development Objective
PIM	Project Implementation Manual
PIU	Project Implementation Unit
REC	Regional Economic Community
RISA	Rwanda Information Society Authority
RURA	Rwanda Utilities Regulatory Authority
SDM	Single Digital Market
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SOP	Series of Projects
SSIGW	South Sudan International Gateway
TA	Technical Assistance
TCRA	Tanzania Communications and Regulatory Authority
UN	United Nations
WTO	World Trade Organization

INTRODUCTION

Background

The East African Community (EAC) has four pillars for regional integration, which are in fact milestones towards creating a sovereign federation comprising EAC members. These pillars are a customs union, a common market, a monetary union and a political federation. The customs union took effect in 2005. The East African Common Market Protocol was launched in 2010. As a next step, the EAC's goal is implementation of a common currency by 2024, followed by a political federation thereafter. Regulations, directives and decisions of the Council are binding on the member states and other organs of the Community other than the Summit, the Court and the Assembly. EAC acts have direct effect and take precedence over similar laws of Partner States. For example, the Customs Management Act, 2004 was enacted by the Assembly to replace the respective customs laws of the Partner States. It was directly applicable without a ratification process.[5] Decisions of the East African Court of Justice (EACJ) on the interpretation and application of the EAC Treaty have precedence over decisions of national courts. (Art.33) Therefore, by virtue of this provision, certain EACJ court decisions have direct applicability in national courts. The EAC Treaty requires Partner States to pass national legislation to give legal effect to the EAC Treaty and confer upon the EAC legislation, regulations and directives the force of law. (Art. 8.2).

The EAC has initiated key steps towards regional digital integration. For example, the One Network Area (ONA), adopted by the EAC, has capped rates for cross-border voice traffic originating in the member countries and eliminated mobile roaming charges. This means that all calls among the EAC countries are to be treated as domestic calls. The EAC Council of Ministers also adopted an e-Commerce Strategy in July 2022, which aims to contribute to enhancing capacities for growth, improve legal and regulatory frameworks and increase trust in digital trade. The strategy also aims to strengthen cross-sectoral and public-private collaboration in developing regional approaches to cross-border e-commerce, a key building block towards a regional single digital market. However, the full implementation and expansion of the ONA and the e-Commerce Strategy require support both for the EAC as well as Member States.

The World Bank and the East African Community (EAC) are in the process of preparing the East Africa Regional Digital Integration Project (EA-RDIP). The EA-RDIP consists of a Series of Projects (SOPs). In Phase I, the SOPs include three countries from the Horn of Africa region - Ethiopia, Somalia, and South Sudan – as well as two Regional Economic Communities: The East African Community (EAC) and the Intergovernmental Authority on Development (IGAD). Country projects under Phase I will first and foremost focus on the development of the regional connectivity market, given the lingering and large infrastructure deficits that still exist at the national level in these three countries, while laying the foundations for initial development of the two other marker layers that will be the focus of subsequent SOPs. Meanwhile, EAC and IGAD were selected based on their mandate and membership, which allows for full geographic coverage of the whole Eastern Africa region, including the Horn of Africa sub-region.

Activities at the regional level have the ultimate goal of supporting the development of a dynamic, seamless "single digital market" (SDM), including cross-border services and ecommerce in-line with the African Union's Digital Transformation Strategy 2020-2023 and its goals. Based on the SDM Framework, the activities under the project will focus on three main pillars of the digital market: connectivity, data and the online market more broadly. They will support the introduction of regional legal and policy tools

that can facilitate online cross-border transactions for goods and services, as well as reducing regulatory barriers to investment and competition in telecommunications and improving the security of personal data, online transactions and critical infrastructure. Adoption of harmonized strategies, legal, and regulatory frameworks will contribute to the creation of a larger digital market capable of generating economies of scale and network effects critical to fuelling investment in digital infrastructure and services.

The World Bank's Environmental and Social Standard 10[1] recognizes the importance of open and transparent engagement with all project stakeholders, based on the recognition that effective stakeholder engagement can improve E&S sustainability of project activities, enhance project acceptance, and implementation, and allow stakeholders to contribute to project design. The key objectives of stakeholder engagement include a) an assessment of the level of interest and support of the project by stakeholders to promote effective and inclusive engagement with all project-affected parties and b) to ensure that project information on E&S risks and impacts is disclosed in a timely and understandable way.

This Stakeholder Engagement Plan (SEP) outlines all stakeholder engagements for the EAC activities under the EA-RDIP in a systematic way. It defines legal and policy requirements in regard to stakeholder engagements, lists stakeholder engagements that have already been undertaken, provides a stakeholder analysis of all relevant project-affected parties, including members of vulnerable groups, to the EAC activities under the EA-RDIP and lays out the means of dissemination of information to different parties as well as means and ways to continue to consult different stakeholder groups throughout the project cycle. Furthermore, it contains a monitoring plan for the implementation of the SEP.

Project Development Objective

The SOP Development Objective is to promote the establishment of an integrated digital market across Eastern Africa by increasing cross-border broadband interconnectivity, and facilitating data flows and digital transactions in the region.

The Project Development Objective (PDO) of SOP-I is to advance regional digital market integration through increasing access to broadband connectivity and strengthening the enabling environment for digital service delivery.

Project Components

The relevant project components implemented by the EAC are as follows:

Component 1: Connectivity Market Development and Integration

Sub-component 1.3: Enabling legal, regulatory and institutional ICT environment

[1] The World Bank, Environmental and Social Framework (ESF), 2018.

To support the harmonization of cross-border telecommunication infrastructure and services in the EAC and IGAD member states, the project will finance a set of legal, regulatory and technical assistance activities and capacity building programs, which will include an assessment on the enhancement and expansion of ONA; the development of regional and regulatory frameworks to increase competition and investment for telecom infrastructure; updating and development of an implementation plan for the development of IGAD's *ICT Master Plan*; development of a regional spectrum strategy and enhancement of coordination mechanisms and standards and guidelines for spectrum management based on international best practice; preparation of regional policies, guidelines and standards to enhance regional connectivity infrastructure; development of regional guidelines for increasing digital inclusion and technical assistance and capacity building to harmonize regional statistical frameworks for the digital sector; and the provision of capacity building for select sub-regional institutions such as the East African Communication Organization (EACO) as well as technical working groups under the EAC and IGAD to support policy and regulatory coordination and knowledge sharing for connectivity market integration.

Component 2: Data Market Development and Integration

Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity

This subcomponent aims to strengthen and harmonize cybersecurity frameworks across the EAC and IGAD member states to enhance the security of the cross-border data flows. It will comprise financing for legal and technical assistance as well as capacity building for responding to cyber threats/cybercrimes, awareness campaigns about cyber security at the regional level, and services and equipment for the creation of a regional cybersecurity coordination platform. Specific activities include legal advisory, technical assistance and trainings to establish and operate a regional cybersecurity coordination platform ("regional virtual CERT") for officials at the EAC and IGAD; purchasing of ICT equipment and cybersecurity subscription services for the set-up of a regional virtual CERT / CSIRT for the EAC and IGAD; technical assistance to develop regional cybersecurity standards; legal advisory to inform regional principles and rules on cybersecurity for the EAC and IGAD, including a needs assessment towards accession to existing regional and international framework for cybersecurity and the mutual legal assistance in judicial cases required access to restricted data (e.g., Budapest Convention) paired with capacity building for government officials on the implementation of such frameworks; awareness raising events and technical workshops for stakeholders, particularly in the financial, telecom and infrastructure sectors, covering compliance with international practices on cybersecurity; and trainings and knowledge sharing workshops on cybersecurity principles, policies, international practices for regional and national policymakers in the EAC and IGAD.

Sub-component 2.2: Data exchange, governance and protection.

This sub-component focuses on safeguarding personal data, promoting trust in cross-border data transactions. Activities under this subcomponent will focus on enhancing the regional enabling environment and institutions required to integrate the data market towards the harmonization of data protection regulation, and include a mix of legal, regulatory, technical assistance and capacity building in the below areas: legal assistance in drafting of regional instruments on data protection – such draft directives, guidelines, standards, etc. - enshrining common principles in the treatment of cross-border

data across the EAC and IGAD; drafting of regional policies, guidelines, or other instruments to promote data interoperability within the EAC and IGAD, in coordination with other RECs and the development of regional standards for data interoperability; a feasibility study and recommendations for the establishment of rules and procedures for cross-border data flows from the region to the rest of the world, a situational analysis and needs assessment on regional data centers, including demand and supply-side assessments, identifying options for attracting private sector investment and strategic partnerships and reducing environmental and climate impact. This would be complemented by capacity building and awareness raising for relevant stakeholders at a regional level; and training and peer-to-peer learning workshops for regional and national policymakers and stakeholders in the EAC and IGAD on data governance.

Component 3: Online Market Development and integration

Sub-component 3.1: Digital cross-border trade, payment and service enablers.

This sub-component will promote trade in services and e-commerce across the region through support to the implementation of the EAC's e-Commerce Strategy and the development of such a strategy for IGAD, preparing the ground for AfCFTA's E-Commerce protocol negotiations. The activities under this sub-component will support the establishment of region-wide rules on online markets by promoting the harmonization of laws and regulations in a series of policy areas essential to digital markets integration. Policy areas covered by this subcomponent will focus on enabling remote transactions, such as digital ID, electronic documentations and e-signature, and set out rules for the functioning of online markets and services, including responsibility of online intermediaries. Specific activities will include an assessment of regional data governance and protection frameworks' compliance with international instruments; legal and regulatory advisory on digital markets regulation; legal advisory towards the preparation of a regional e-Commerce and digital trade strategy for IGAD; a gap assessment of current regulatory frameworks and business practices for online payments in the EAC and IGAD and legal advisory and drafting services for regional policies, rules or guidelines for the interoperability of financial data across EAC and IGAD member states; technical and legal assistance towards the establishment of a regional framework for the mutual recognition of e-signatures in the EAC and sharing of standards and best practices with IGAD; technical assistance and capacity building for EAC and IGAD to monitor the development and uptake by member countries of regional or international guidelines in digital trade regulation (EAC, IGAD); development of common principles and guidelines for access to national ID systems, and recommendations to ensure cross-country interoperability; capacity building for regional and national policymakers and regulators on regional digital market regulation, including seminars, trainings and other knowledge sharing; awareness raising and trainings for stakeholders in the EAC and IGAD on digital market regulation, including cross-border payments, safeguards for online users and consumer protection; and financing of equipment to develop payment systems infrastructure at the regional level in support of interoperable cross-border payment systems across EAC member states.

Component 4: Project Management and Implementation Support

This component will finance technical assistance and capacity support for project implementation under the EAC and IGAD. It will finance the setting up and operating costs of the Project Implementation Unit (PIU) within the ICT Department of the EAC and within the Trade Department of IGAD. The PIU will

provide support to ensure the establishment of adequate competencies, social and environmental safeguards capacity, as well as fiduciary and monitoring and evaluation (M&E), for the implementation of activities at the national level. In addition, the project will finance capacity building, stakeholder engagement and convening of technical working groups to strengthen both PIUs' coordination for project implementation with member states and each other. This component will also help strengthen the technical and functional capacity of the PIUs, including the recruitment of expert consultants in key areas, the facilitation of on-the-job learning and competency transfer, as well as workshops with other RECs.

Project Geographical Location

The activities of the EAC will be implemented in the partner states forming the East African Community Region, i.e. Burundi, Kenya, Rwanda, South Sudan, Tanzania and Uganda; and Ethiopia participating at the technical level.

Figure 1 Map showing geographical location of the program area

Institutional Arrangements

REC activities will be implemented through two regional PIUs – at the Planning Directorate under the EAC and at the Trade Department under IGAD. The regional PIUs will be responsible for overall implementation and coordination of project activities at regional level. At EAC, project implementation will leverage the procedures and structures, expanded as needed, of an existing PIU within the EAC Secretariat previously established under the *Eastern Africa Regional Statistics Program for Results* (P176371).

The EAC PIU will be headed by a Project Coordinator, appointed from among the senior staff of the EAC, or competitively recruited. The PIU will also include at least one Procurement Specialist, one FM specialist, technical experts (e.g., Digital Services Specialist) as needed, one M&E Specialist, one Environmental and Social (E&S) Specialist and one Communication and Outreach Coordinator. It is expected that these will be part-time positions, shared with other World Bank projects. Both, the E&S Specialist and the Communications and Outreach Coordinator will be responsible for the implementation of this SEP.

PIU coordination: given that digital market integration is cross-cutting, regionals PIUs will be expected to ensure cross-departmental collaboration within each REC. They will also be responsible for collaboration with (a) other key regional and international specialized agencies that are taking part in and/or benefiting from project activities at the REC level; and (b) the national PIUs for activities implemented at country level under the project, where they are closely aligned with REC activities. The EAC and IGAD will also collaborate closely in the design and implementation of the activities implemented at a regional level under the project. The two RECs already collaborate to ensure consistency between their initiatives, which is further reinforced by their overlapping membership (Kenya, Uganda, and South Sudan). Each PIU at national and regional level under the project will nominate a focal point to liaise with the other PIUs to ensure coordination for the implementation of select, interconnected project activities. The arrangements for cross-PIU coordination will be detailed in the project implementation manuals (PIM) required for all Borrowers and RECs.

A Regional Project Steering Committee (RPSC) will be established to facilitate high-level dialogue and coordination between the project countries and regional bodies for the direction of the project. The RPSC will provide guidelines to each Regional PIU, and it will comprise of representatives from both the EAC and IGAD as well as selected member states, on a rotational basis. The mechanisms for selection of representatives for the RPSC will be detailed in the REC PIMs. The RPSC will be expected to meet at least once a year.

Objectives of the SEP

This SEP will apply to all components of the project. The Stakeholder Engagement Plan (SEP) aims at facilitating stakeholder engagement throughout the Project's life cycle and across the various project components.

The objectives of this SEP are:

- To identify project stakeholders, including members of vulnerable groups, their priorities, and concerns.
- Identify strategies for information sharing and communication to stakeholders as well as consultation of stakeholders in ways that are meaningful and accessible throughout the project cycle.
- To specify procedures and methodologies for stakeholder consultations, documentation of the proceedings and strategies for feedback.
- To establish an effective, transparent and responsive grievance mechanism for the project.
- To develop a strategy for inclusive and meaningful stakeholder participation in the monitoring of project impacts, documenting, reporting and dissemination of results among the different stakeholders.

Regulations and Requirements

Stakeholder engagement is an inclusive process conducted throughout the project life cycle to support the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. The World Bank's Environmental and Social Framework (ESF) includes Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement with the project stakeholders as an essential element of good international practice". ESS10 also provides that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. The standards will:

a. support Borrowers in achieving good international practice relating to environmental and social sustainability;
b. assist Borrowers in fulfilling their national and international environmental and social obligations;
c. enhance non-discrimination, transparency, participation, accountability, and governance; and
d. enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

Stakeholder engagement is also provided for in the **various forms of** national legislation including the constitutions and legislation on environmental and social impact assessments and audits. The instruments unanimously advocate for meaningful involvement of project stakeholders in decisions that affect them, participatory planning, and trans-parent grievance management mechanisms.

STAKEHOLDER IDENTIFICATION AND ANALYSIS

The Eastern Africa Regional Digital Integration Project's (EA-RDIP) stakeholders are individuals or groups (parties) that can be affected by the project outcomes, either directly or indirectly and both positively or negatively (Project-Affected Parties (PAP)) or have an interest in the project (other interested parties (OIP)). Analysis of stakeholders therefore encompasses identification of the stakeholder groups that are likely to influence or be affected by the proposed project components either positively or negatively and organizing them according to the potential impacts of the activities on them.

EA-RDIP stakeholders can be classified based on: a) their roles and responsibilities in the project; b) the influence/interest in the project; c) whether they are direct or indirect beneficiaries; and d) whether they are vulnerable groups.

Key stakeholder groups based on access to benefits include:

a) Project Affected Parties:

Direct beneficiaries

Regional level

1. EAC Secretariat
2. EAC Partner States
3. EAC policy organ
4. East African Legislative Assembly (EALA)
5. East African Community Competition Authority
6. Other EAC institutions

National level

1. Ministries or regulatory bodies for Communication, Information Technologies, Innovation and Media
2. Offices for Data Protection
3. National Cyber Security Authorities/ National Computer and Cybercrimes Coordination Committee / Computer Emergency Response Team
4. Utilities Regulatory Authority
5. Information Society Authority
6. National Information Technology Authority
7. Government Certificate Authorities
8. Ministries of Trade and Industry and Cooperatives
9. Ministries of Interior
10. Central Banks
11. Consumer Protection Councils
12. National Identification Agencies
13. Competition Commissions
14. Revenue Authorities
15. Ministries of Finance

Indirect beneficiaries

1. Investors and traders
2. Academic institutions
3. Civil society organizations
4. Donor community and international organizations
5. EAC Members
6. Service providers (Conference facilities, air travel, research)
7. Consultants

b) Other Interested Parties including Civil Society Organizations (CSOs) (Non-governmental Organizations and Community Based Organizations), and Academia

c) Vulnerable Groups

Overall stakeholder groups at different stages of the project, (i.e. preparation, implementation and closure) are presented in Table 1. Considering that stakeholders are likely to change in the course of the project, the stakeholder list will be revised and updated continuously to include new stakeholders with access to additional information.

Table 1 Summary of Stakeholders Identification

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meetings)
REGIONAL								
EAC Partner States	Governments (Burundi Kenya, Rwanda, South Sudan, Tanzania, Uganda)	Develop appropriate polices and laws/regulations	High	PAP		Language translators	Meetings, email, phone, internal memo,	Accessibility, Currency, Accuracy
EAC policy organ	Summit of EAC Heads of State	Assent to Bills	High	PAP		Language Translators	Meetings	Accessibility
	EAC Council of Ministers	Approve project budget and deliverables	High	PAP		Language Translators	Meetings, email, phone	Accessibility, Currency, Accuracy
	Sectoral Committee on Statistics	Approve project deliverables and reports	High	PAP		Language Translators	Meetings, email, phone	Accessibility, Currency, Accuracy
East African Legislative Assembly (EALA)	Inter-governmental	Appropriation of Project budget, and legislation for regional statistical legal framework	Medium	PAP		Language Translators	Meetings, email, phone, internal Memo	Accessibility, Currency, Accurate information
East Africa Community Competition Authority (EACA)	Institution of the EAC	Promote cooperation in trade liberalization and development including matters of competition	High	PAP		Language Translators	Meetings, email, phone, internal memo,	Technical knowhow Accessibility availability

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meetings)
NATIONAL LEVEL								
Ministries or regulatory bodies for Communication, Information Technologies, Innovation and Media	Government	Regulate standards and services in the communications technology	High	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Technical knowhow Accessibility availability
Offices for Data Protection	Government	Data protection	High	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Technical knowhow Accessibility availability
National Cyber Security Authorities/ National Computer and Cybercrimes Coordination Committee / Computer Emergency Response Team	Government	Cyber security	High	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Technical knowhow Accessibility availability
Utilities Regulatory Authority	Government	Regulate electricity	High	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Technical knowhow Accessibility availability

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meetings)
Information Society Authority	Government	Oversee digital transformation	High	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Technical knowhow Accessibility availability
National Information Technology Authority	Government	e-government service delivery	High	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Technical knowhow Accessibility availability
Government Certification Authorities	Government	Digitally signing other entities' certificates	High	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Technical knowhow Accessibility availability
Ministries of Trade and Industry and Cooperatives	Government	Trade regulation	High	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Technical knowhow Accessibility availability
Ministries of Interior	Government	Overseeing internal security and administration	High	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Technical knowhow Accessibility availability
Central Banks of the Partner States (Research department)	Government	Formulation of monetary policy	Medium	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Accessibility, availability

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meetings)
Consumer Protection Councils	Government	Addressing consumer complaints	Medium	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Accessibility, availability
National Identification Agencies	Government	Issuing of ID cards	Medium	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Accessibility, availability
Competition Commissions	Government	Control business practices	Medium	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Accessibility, availability
Revenue Authorities of the Partner States, (Statistics Department/unit)	Government	Collection of revenues	Medium	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Accessibility, availability
Ministries of Finance	Government	Formulation of economic policies	Medium	PAP		Respective National Language(s)	Meetings, Formal letter, email, phone	Accessibility, availability
Indirect Beneficiaries / Other Interested Parties / Vulnerable Groups								
Investors and traders	Private Sector	To make investment and business decisions based on the data		OIP		Local languages	Meetings, Formal letter, print media	Accessibility, Accurate information

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meetings)
Academic institutions	Academia	Research and teaching		OIP		Local languages	Meetings, Formal letter, print media	Accessibility, reliability
Civil societies and organisations	CSOs, NGOs and FBOs	Advocacy and holding governments to account		OIP		Local languages	Meetings, Formal letter, print media	Accessibility, Timing, participation by stakeholders
Donor community	Donor Community	Development Assistance		OIP		Local languages	Meetings, Formal letter, print media	Accessibility, Inclusion, Gender responsive data
EAC Community Members	Community Members	Making decisions based on the data		OIP		Local languages	Meetings, Formal letter, print media	Daytime meetings, local languages, large print, accessibility. Gender and cultural appropriate consultations
Consultants	Private sector	Provide consultancy services	Medium	OIP		Local languages	Meetings, Formal letter, print media	Accessibility, Accurate information
Vulnerable groups	Those who may be more likely to be adversely affected by project impacts and/or more limited	Provide data on issues that affect them and make decisions based on data	Medium	OIP		Official and local languages, translators where appropriate	Meetings, Formal letter, print media	Daytime meetings, local languages, large print, accessibility. Gender and cultural appropriate consultations

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meetings)
	than others to access benefits							

STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement refers to the process of interacting and working with stakeholders identified as relevant to the project to come up with new concepts, identify challenges and discrepancies and how to address issues that may rise. All this helps in the realization of stakeholder needs and expectations for effective implementation of project components.

The Stakeholder Engagement Plan (SEP) is used to formulate schedules, strategies and general plans to ensure there **is effective, meaningful and inclusive participation of project affected persons, including members of vulnerable groups, and other interested parties, throughout the entire project life cycle**. It consists of planning on how consultations will take place, developing the layout and how issues raised will be addressed and responded to in a transparent, meaningful, timely and inclusive manner. The importance of this is to provide an effective outline of activities to be undertaken within a given timeframe to ensure effective stakeholder involvement and improve the project's sustainability and development benefits. The SEP outlines how consultations are to be carried out and the scope of work to be achieved. The SEP will be updated on a regular basis to promptly include new developments and issues that may arise. This may include the techniques to be used in the engagement of stakeholders to address stakeholder concerns and enhance project ownership.

The SEP describes the timing and methods of engagement with stakeholders throughout the life cycle of the project as agreed between Bank and Borrower, distinguishing between project-affected parties and other interested parties. The SEP also describes the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them.

The SEP includes a description of the project with its anticipated environmental and social impacts, as known at the time; a list of the stakeholder groups identified, including disadvantaged or vulnerable individuals or groups; the proposed stakeholder engagement program (including topics stakeholders will be engaged on, how stakeholders will be notified, the methods of engagement, list of information/documents that will be in the public domain, languages they will be available in, length of consultation period, and opportunities to comment); indication of resources required and the responsibilities for implementing stakeholder engagement activities; summary description of the grievance mechanism; and contact information and process for seeking further information.

Preparation Stage. Summary of Previous Stakeholder Engagement Activities

A variety of stakeholder engagements have been undertaken for the preparation of this project, including in regard to project design and anticipated social and environmental risks and impacts.

A Project preparation mission for the regional activities of the project was held from September 26-30, 2022, including a regional level workshop from September 26-27, 2022 in Arusha, Tanzania. Consulted stakeholders included representatives from the Ministry of Trade and Industry in South Sudan; the Ministry of Industrialization, Trade and Enterprise Development in Kenya; the Ministry of ICT and Innovation in Ruanda; the Telecommunications Regulatory and Control Agency in Burundi; the Ministry of East African Community Affairs from Uganda; Ministry of Information, Communications and Information Technology in Tanzania; the East African Community (EAC); and the East Africa Health Research

Commission. Key objectives of the mission were to hold a validation workshop at the East African Community (EAC) with technical counterparts from Partner States on a draft regional digital roadmap and proposed priority areas for its implementation; confirm activities to be financed by the project and implemented by the EAC; discuss coordination mechanisms and refine implementation arrangements at the EAC; and kickstart the required fiduciary assessments for the project.

During the workshop, the Republic of Burundi welcomed the project initiative and stated that it had adopted a National Strategic Plan for the Development of E-Commerce in line with the EAC E-Commerce Strategy. The Republic of Kenya noted that the project initiative was conceived at an appropriate time following the adoption of the EAC E-Commerce Strategy, which aims at enhancing capacities for growth, improving legal and regulatory frameworks, and increasing trust in digital trade. It stated that the country had undertaken an E-Readiness study, which has informed the development of a national draft E-Commerce Strategy. It also stated that several other initiatives, such as the Horn of Africa Cable and Eldoret-Nadapal Projects are ongoing. The United Republic of Tanzania stated that the country was in progress of developing an E-Commerce Strategy and National Digital Economy Framework. The Republic of Uganda called on all partner states to ensure that national strategies are aligned with regional ones. The Republic of South Sudan affirmed that the development of a regional framework will guide the partner states in the development of national laws and regulations.

These participants at the workshop further made the observation that regional digital inclusion also empowers youth, persons with disabilities, and women; technology costs on data roaming is currently very high and there is need to reduce costs with a view to establishing seamless connectivity across the region; there is need to develop national strategies that will address the impact of natural disasters and climate change on connectivity infrastructure; and there is need to develop and implement a regional framework for regulatory oversight of postal services and national addressing systems in the region to facilitate e-commerce. Furthermore, interoperability of postal systems, regional control rooms in customs, and e-commerce superhighway of the regions need to be promoted. Capacity development, regional repositories, online training modules and tools, knowledge sharing and skills development are required. In addition, ICT data collection and national statistics need to be enhanced. The Project aims to fill these gaps.

In view of e-payments, stakeholders emphasized the need to establish interoperability of the mobile payment system across the region, as well as other payment systems in the world. E-signature recognition in the region should be established to better facilitate e-commerce and intra-regional trade and subsequent participation in the African Continental Free Trade Area. E-signature was pointed out to be important also for improving custom procedures as recognized by the Trade Facilitation Agreement of the WTO. In view of online customary protection, the establishment of in-line consumer protection guidelines under the e-Commerce protocol should be informed and should be brought in line with the OECD guidelines.

In regard to data protection, Kenya, Uganda and Ruanda have strong data protection laws and monitoring institutions, while Tanzania and Burundi lack a robust data regulation. The Project will address data protection by focusing on key priorities: interoperability of laws and regulations of data protection and cross-border data to foster a more integrated regional digital market; development of a framework for data protection in a manner that fosters a data interoperability across the region; a mechanism that facilitates the safe sharing of data; and ensuring data protection to ensure the trust of users.

Stakeholders at the workshop further raised concerns of cyber security. This will be addressed by the Project by enabling cross-border business activity through harmonized cybersecurity legislation, policies and standards. Furthermore, the Project will help to protect East Africa's networks, platforms, applications and services from attacks. It will protect East Arica's GDP from losses through cybercrime. It will create a reliable and trust worthy regional enabling environment for investment and support the sharing of threats and incidents.

Participants at the workshop made the following observations regarding cybersecurity: they stated that there is a need for a uniform understanding of terms, such as personal and non-personal data; challenges occur when criminal activity crosses jurisdictions; there is a skills gap in cybersecurity; it needs to be ensured that he protection of children and persons with disabilities is well incorporated into legislation and policies. The Project will aim to address these issues.

The mission also included informal consultations with government officials and donors in Tanzania. In Dodoma, the mission met with Acting Director of Trade Policy at the Ministry of Industry, Trade and Investment of Tanzania. The Acting Director expressed that the proposed deliverables are likely to be welcomed and endorsed by the leadership of the Trade Ministry. It was proposed that an additional study be conducted to estimate the impact of potential regulatory harmonization on data governance and e-commerce on regional trade flows, with a focus on digital services, to help quantify the economic benefits of project for the region. The Project agreed to consider ways to include such study.

The mission also met with representatives from the Gesellschaft für Technische Zusammenarbeit (GIZ) to coordinate on relevant activities pertaining to the integration of the regional data market. GIZ is currently implementing a broad support program for the EAC, which is focused on e-commerce and forms part of their Pan-African e-Commerce Initiative. For the EAC, GIZ has concentrated mostly on developing the regulatory framework for consumer protection, capacity building activities on cybersecurity and the establishment of a broad capacity building platform and programs supporting the cross-border movement of engineers. GIZ welcomed the EARDIP priorities and proposed activities, and noted the complementarity of the projects. It was agreed that the WB, EAC and GIZ would continue to coordinate as the projects are advancing.

During the South Sudan Country Diagnostic Mission from February 21-25, 2022, the World Bank team consulted with a broad array of stakeholders, including from the Ministry of Information, Communications Technology and Postal Services (MICT&PS), the National Communications Authority (NCA), private sector entities, UN partners, the Chamber of Commerce, Industry and Agriculture, Ministry of Trade and Industry, Ministry of General Education, universities and educational centers, telecom providers, insurance providers, public and private commercial banks, digital public platforms, fintech players and digital businesses, and others.

Consultation results from a World Bank diagnostics mission in February 2022 in South Sudan indicated that affordable, accessible and reliable internet connectivity is the highest priority for government to address. At present the connectivity via a single route to Juba is creating a risky dependency; most states face the risk of digital exclusion in the absence of government support for the expansion of private sector investments; ICT institutional and governance arrangements exist but lack sufficient capacity; and the telecom regulator could use Technical Assistance (TA) on creating a more conclusive and effective regulatory frameworks. Stakeholders consulted broadly acknowledged that investing in expanding connectivity can have a wide ranging economic benefit for the country.

Representatives of universities in South Sudan, which were consulted during the mission, stated that they are offering ICT courses at the undergraduate level. However, this service is mainly focused on Juba. The University of Juba and the Kampala University both have basic ICT infrastructure. The Government of the Republic of South Sudan responded that it was considering a digital skills competency framework within to better define and measure the level of digital skills; and to introduce computer science curriculum from the primary education level instead of starting from secondary level.

Consultations with the GoGirls ICT initiative, the South Sudan Women's Entrepreneurs Association and South Sudan Women Finance (women's associations and businesses) during the mission in February 2022 in Juba showed that gender disparities are generally staggering in South Sudan – which can be seen in the ICT sector. While there are no gender statistics in the ICT sector, consultations showed the existence of a gender gap. For example, in schools, more boys enroll in ICT courses than girl. Stakeholders expressed that ICT is generally not seen as a women's career option. More girls drop out of ICT programs then boys. Stakeholders also indicated a "lack of female role model effect in the classroom.". Outside of the classroom, women face barriers in accessing ICT infrastructure such as devices or internet because they have lower purchasing power and mobility.

Project Preparation Mission: During the broader regional Project Preparation Mission to Addis Ababa, August 30 to September 30, 2022 the World Bank team consulted with a variety of stakeholders, including from the Regional Economic Communities (RECs), Intergovernmental Authority on Development (IGAD) and the East African Community (EAC). As part of this broader regional mission, a reverse mission for South Sudan was held from September 2-9, 2022. During the reverse mission, consulted stakeholders included representatives of the MICT&PS, Ministry of Finance and Planning (MoFP), National Communications Authority (NCA), and the CEO from the South Sudan International Gateway (SSIGW) (see Annex 1).

The mission included cross-country exchanges and dialogues between Ethiopia, Somalia and South Sudan, in which countries committed to regional digital integration. Furthermore, consultations indicated that private sector participation in financing for infrastructure development is critical to fill any financing gaps. The mission further discussed scope and budgets for project activities, financing of project preparations through PPA, and the leveraging of complementary support from Trust Funds.

Purpose and Timing of Stakeholder Engagement Program

Project preparation has relied significantly on stakeholder engagement in order to gain a granular understanding of needs and priorities at each level and assess any potential environmental and social risks the project may have.

The objectives of information dissemination and consultations under the EA-RDIP are: (a) understanding of the digital concerns of stakeholders in the EAC; (b) reception of feedback and comments as well as grievances from all stakeholders on project design and implementation; c) feedback on potential environmental and social risks and impacts and mitigation measures; (c) provision of regular information to stakeholders related to project implementation progress and any other emerging issues throughout the project cycle and (d) provision of transparent and accountable mechanisms on all aspects of the project implementation.

To ensure this, a grievance redress mechanism (GRM) will be set up and implemented throughout the life cycle of the project (see below). It is designed to allow all affected individuals and groups to report on project-related grievances or to provide comments and feedback. In addition, the ESCP and this SEP will be publicly disclosed to ensure that everyone is informed about social and environmental risks and respective mitigation measures.

This section outlines some of the proposed methods of stakeholder engagement over the project cycle. Stakeholder engagement will be undertaken on a continuous basis to inform the project affected persons and other members of the public about project activities and plans and will employ appropriate strategies to ensure effective and meaningful disclosure of information, paying particular attention to the needs and interests of members of vulnerable/disadvantaged groups, to enhance increased access to project information. Different engagement methods are proposed and cover different needs of the stakeholders.

Proposed Strategy for Information Disclosure

Information disclosure to the all potential stakeholders will rely on the following key methods: correspondence by phone/mail; memos, virtual meetings, letters, website, email, and leaflets. Information will be disclosed in English or the respective local language, where appropriate.

Table 2 Strategy for Information Disclosure

Information to be disclosed	Target Stakeholders	Messages/ Agenda	Methods of Communication	Time Table: locations / dates	Responsibility
Project Preparation					
Stakeholder Engagement Plan (SEP) Environmental and Social Commitment Plan (ESCP)	Representatives of implementing institutions and agencies Regional and Government Agencies	Present the Project – objectives, rationale, components, benefits and beneficiaries, Implementation arrangements. Indicative implementation schedule and period, project contacts. Describe Grievance Redress Mechanism (GRM). Present stakeholders identified and describe approach to stakeholder engagement. Sets out measures, actions, plans, and	Correspondence by phone/email Memos Meetings (virtual) Letters Telephone	During project preparation EAC region	EAC Secretariat
Project information	Regional and Government Agencies Consultants	Email message to advise Stakeholders of disclosure and where to access the disclosed documents. Advertisement in newspaper Disclosure of Project documentation in a culturally appropriate and accessible manner	Upload on websites Email copies to key individuals and organizations.	During project preparation and throughout implementation EAC region	EAC Secretariat
THROUGHOUT THE PROJECT					
Quarterly, annual progress reports	All stakeholders OIP	General information on project, activities Updates to Project instruments Inputs into Project activities Grievance Mechanism	Posting Information on leaflets One to one meeting	Throughout project implementation EAC region	EAC Secretariat EAC Secretariat
Information on GRM	OIP	Maintain website with contact box for people to submit questions.	Websites Phone	Throughout project implementation EAC region	EAC Secretariat

Proposed Strategy for Consultation

This plan lays out the overall consultative processes of the project with its different stakeholders. The GRM will be another means of consultation, as complaints received will be filed, assessed and responded to (see below). Vulnerable and minority groups will be consulted in close cooperation with the country-specific SEPs.

Table 3 Strategy for Consultation

Topic of Consultation	Target Stakeholders	Expected outcomes	Suggested Method of consultation	Timetable: location and dates	Responsibility
Project Preparation					
Stakeholder Engagement Plan (SEP) Environmental and Social Commitment Plan (ESCP)	Representatives of implementing institutions and agencies Regional and Government Agencies	Inputs into Grievance Redress Mechanism (GRM). Inputs into stakeholders identification and approach to stakeholder engagement.	Correspondence by phone/email Meetings (virtual) Telephone	One off activity as part of project preparation EAC region Frequency: one time	EAC Secretariat
Final Project design / overall project activities	Regional and Government Agencies Consultants	Inputs into project design - objectives, rationale, components, benefits and beneficiaries, Implementation arrangements. Inputs into indicative implementation schedule and period, project contacts.	Correspondence by phone/email Meetings (virtual) Telephone	One-off activity as part of project preparations EAC region Frequency: one time	EAC Secretariat

Topic of Consultation	Target Stakeholders	Expected outcomes	Suggested Method of consultation	Timetable: location and dates	Responsibility
Stakeholder Engagement Plan (SEP) Environmental and Social Commitment Plan (ESCP)	Beneficiaries: - Service users in different countries (NGOs operating in the sector) - Women (national and sub-national women's groups and associations) - Youth (national and sub-national youth groups and associations) - Minority groups (minority groups representatives, NGOs or CSOs working with minority groups)	Inputs into Grievance Redress Mechanism (GRM). Inputs into stakeholders identification and approach to stakeholder engagement. Inputs into project design - objectives, rationale, components, benefits and beneficiaries	Meetings (virtual) Virtual meetings with NGO representatives Focus Groups Discussions with representatives of women's groups and youth groups Focus group discussions in sample minority communities and with NGOs or CSOs working with minority groups	One-off activity as part of project preparations EAC region Frequency: one time	EAC Secretariat
THROUGHOUT THE PROJECT					
Project design / overall project activities	All stakeholders - Service users in different countries (NGOs operating in the sector) - Women (national and sub-national women's groups and associations) - Youth (national and sub-national youth groups and associations)	Inputs into project, activities	One to one meeting, Email, Meetings (virtual) Meetings (virtual) with representative organizations Virtual meetings with NGO representatives Focus Groups Discussions with representatives of	Throughout project implementation EAC region Minimum frequency: quarterly with al lgroups	EAC Secretariat

Topic of Consultation	Target Stakeholders	Expected outcomes	Suggested Method of consultation	Timetable: location and dates	Responsibility
	- Minority groups (minority groups representatives, NGOs or CSOs working with minority groups) - Other members of disadvantaged groups		women's groups and youth groups Focus group discussions in sample minority communities and with NGOs or CSOs working with minority groups In addition, vulnerable and minority groups will be consulted through country-specific SEPs, based on contextually appropriate methods		
SEP and GRM	All stakeholders - Service users in different countries (NGOs operating in the sector) - Women (national and sub-national women's groups and associations) - Youth (national and sub-national youth groups and associations) - Minority groups (minority groups representatives, NGOs or CSOs working with	Updates to Project E&S instruments Inputs into Project activities Grievance Mechanism Maintain website with contact box for people to submit questions.	Email, Phone Meetings (virtual) with representative organizations Virtual meetings with NGO representatives Focus Groups Discussions with representatives of women's groups and youth groups Focus group discussions in	Throughout project implementation EAC region Minimum frequency: quarterly with all groups	EAC Secretariat

Topic of Consultation	Target Stakeholders	Expected outcomes	Suggested Method of consultation	Timetable: location and dates	Responsibility
	minority groups) - Other members of disadvantaged groups		sample minority communities and with NGOs or CSOs working with minority groups In addition, vulnerable and minority groups will be consulted through country-specific SEPs, based on contextually appropriate methods		
M&E	All stakeholders - Service users in different countries (NGOs operating in the sector) - Women (national and sub-national women's groups and associations) - Youth (national and sub-national youth groups and associations) - Minority groups (minority groups representatives, NGOs or CSOs working with minority groups) - Other members of disadvantaged groups	Inputs into monitoring and evaluation of project	Email, Phone Meetings (virtual) with representative organizations Virtual meetings with NGO representatives Focus Groups Discussions with representatives of women's groups and youth groups Focus group discussions in sample minority communities and with NGOs or CSOs working with minority groups	Throughout project implementation EAC region Minimum frequency: quarterly with all groups	EAC Secretariat

Topic of Consultation	Target Stakeholders	Expected outcomes	Suggested Method of consultation	Timetable: location and dates	Responsibility
			In addition, vulnerable and minority groups will be consulted through country-specific SEPs, based on contextually appropriate methods		

Engagement with Disadvantaged and Vulnerable Groups

There are several disadvantaged/ vulnerable groups and persons within the member states who will be included in a culturally sensitive and meaningful manner into stakeholder engagement activities. These include communities that meet the criteria of ESS7 (indigenous People/ Sub-Saharan African Historically Underserved Traditional Local Communities) youths, women and individuals with low literacy levels, students, and persons with disabilities. These groups are at risk of exclusion from consultations and at risk of harm from poor project design or less likely to be able to access project benefits. Limitations related to participation include:

- limited representation or lack of opportunity to express self
- Fear of expressing themselves.
- Language and technology barrier;
- Transport limitations.
- Nature of the disability; and
- Cultural limitations.

The Project has already conducted consultations with members of communities that meet the criteria of ESS7 in South Sudan during a World Bank preparation mission in February 2022 to Juba. Furthermore, during the same mission, women groups were consulted on gender-related issues (see Annex 3).

During the course of the Project, further representatives of the various groups will be identified for engagement. Invitations for the consultations shall be made accessible in good time and with adequate information on the agenda to allow for meaningful participation of a broad range of stakeholders.

Consultations will be conducted throughout project implementation virtually and in places that are suitable for participation of the identified vulnerable groups, such as through physical meetings in the members states' capitals and as part of the country-specific stakeholder engagement plans. Inclusive participation will be ensured through the identified communication needs and will include the following services: translation into appropriate language, sign language, large print information; accessible venues for events; consultations in culturally appropriate manner and convenient venues and timing; small, focused and short meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns.

The PIU will ensure that women and other vulnerable groups are participating in consultative processes and that their voices are not ignored. This may require specific meetings with some of the above identified vulnerable groups at the community level, in addition to general community consultations. For example, women may be more outspoken in women-only consultation meetings than in general community meetings. Similarly, separate meetings will be held with young people or with ethnic minority groups.

In view of promoting gender equality, it is most important to engage women's groups on an ongoing basis throughout the lifetime of the project. Women voicing their concerns and contributing in the

decision-making process should be encouraged, especially where governmental or traditional committees predominantly consisting of men.

GRMs are designed in a way that all groups identified as vulnerable (see below) have access to the information and can submit their grievances and receive feedback as prescribed.

Timelines

Information disclosure and consultations are especially relevant throughout the early stages of the project, but also throughout the project cycle. Project design has therefore been based on consultations. Activities under each Component will include further consultations prior to their commencement to ensure transparency and accountability on project modalities, and to allow stakeholder voices to form the basis of the concrete design of every intervention and consultations will continue throughout the project cycle.

Review of Comments

The PIU will compile all comments and inputs originating from the different consultation methods to ensure that the project has general information on the perception of stakeholders and their concerns, and for the Project to remain on target. It will be the responsibility of all implementers to respond to comments and inputs, and to keep open a feedback line to the communities, as well as the local authorities.

Training on environmental and social standards facilitated by WB will be provided soon after the project becomes effective to ensure that all implementing staff are equipped with the necessary skills.

Estimated Costs for SEP Implementation

The EAC secretariat, will be in charge of managing and implementing the Stakeholder Engagement Plan. Adequate resources for the implementation of stakeholder engagements, including the GRM, will be covered by the budget assigned under the Project Management activities. The EAC will as part of their annual workplans allocate adequate budget to undertake the required stakeholder engagement and implement the GRM noting the need for human and material resources will be required to implement the plan at all levels.

Table 4 Indicative Budget for implementation of SEP

Stakeholder Engagement Activity	Total Cost (USD)
Social experts	
E&S Specialist (50% of time for implementation of SEP for 2 years)	30.000
Communications and Outreach Specialist (50% of time for 2 years)	30.000

Stakeholder Engagement Activity	Total Cost (USD)
Consultation and disclosure	
Consultation sessions and outreach	60,000
Establishment and maintenance of website	5,000
Other disclosure campaigns	100,000
Translation Services	20,000
Grievance redress mechanism	
GRM Hotline	10,000
Dissemination of information on GRM	20,000
TOTAL	**275,000**

GRIEVANCE REDRESS MECHANISMS (GRM)

Purpose

A grievance is an issue, concern, or claim (either perceived or actual) that an individual or community group wants addressed or resolved by the programme. These may include complaints of impacts, damages or harm caused by the project or related activities during construction, operation, or decommissioning phase.

A GRM will be established by the Project to provide a formal process for managing complaints from stakeholders (members of the public, employees, and partners) as provided under ESS10 of the WB ESF and the participating states national requirements. Grievances will be received by a grievance manager – appointed by the grievance committee – in charge of logging and recording all grievances received into the grievance database. The grievance manager shall submit all grievances received to the grievance committee – a committee setup by the EAC Secretariat to handle grievances. The grievance committee shall assess the nature of the grievance or complaint and decide on the appropriate measures to be taken. To be effective, the mechanisms should be transparent, gender responsive, culturally appropriate, and readily accessible to all stakeholders at no cost, without retribution and with a provision for an appeal mechanism. All complaints will be documented, analysed, responded to, and closed, in a timely manner. Annex 1 provides a format for documenting grievances to be adopted in the project.

The objectives of the GRM shall include:

i. Ensure prompt, consistent, and respectful receipt, investigation, and response to complaints.
ii. Identify and manage stakeholder grievances and concerns and thus support effective risk management.
iii. Ensure proper documentation of complaints and implementation of actions.
iv. Contribute to continuous improvement in performance through lessons learned.
v. Enhance trust and positive relationships with stakeholders; and
vi. Ensure compliance with laws and regulations and reduce exposure to litigation.

Potential Grievances

Potential grievances and claims likely to emerge during implementation of the Project may relate to the following issues:

i. Countries in the EAC may not have a common policy and laws to govern data disclosure and sharing
ii. Employment opportunities in the project and labour related issues
iii. Procurement related disputes
iv. Concerns from nongovernmental organizations/civil society organizations about the project
v. Disputes about sexual harassment (SH) and gender-based violence (GBV)

Grievance Management Process

1. Grievance Reporting: the Project will provide a number of channels, both formal and informal for reporting of incidents, complaints, or grievances, in addition to those of partners and the national legal system. Some channels include; Whistleblowing Portal & Email, social media-Facebook, twitter, WhatsApp, programme office and officers. The channels will be published and publicized including on the programme's websites and social media platform for wider access.

2. Grievance Receipt and Logging: Centralized logging and tracking is important both for accountability and for enabling continuous monitoring and learning. Recipients of complaints received through any of the channels above, will share the information with the Grievance manager, for logging into the grievance database, within 48 hours. The database will be monitored and regularly updated with information of progress made and decisions relating to the grievances and compliance with timelines

3. Acknowledgement: The Grievance manager will immediately acknowledge the complaint and inform the complainant that their grievance will be logged and reviewed for eligibility. Acknowledgment will be within 48 hours of receipt and will be in the form of verbal communication for grievances received verbally, and a standard letter or email for grievances received through emails or Whistle-blower channels.

4. Screening and Validation of Complaint: The received grievances will undergo a screening process which will inform the decision on eligibility, categorization, classification, and the course of action to take including escalation to relevant office. The Grievance officer will then provide feedback to the complainant, which may include;

- Request for more information if information provided is insufficient.
- Referral to relevant partners if ineligible under the Programme.
- Action taken and next steps, if eligible.

5. Initial Grievance Response: The Grievance Committee shall make recommendations on how the grievance shall be handled, which shall be documented and captured in database. The response shall be either to: i) Resolve the issue locally – Relevant stakeholders (from the escalation matrix) may take direct action to resolve the complaint, ii) Request an investigation to collect further information – Additional assessment to determine what happened, the causes, responsible persons, and actions to mitigate and prevent future recurrence of the violation, iii) Refer the complaint through the EAC Secretary General to a) in-country mechanisms for resolution for country specific grievances or b) the EAC policy organs (Sectoral Committees, Council, and Summit) as applicable for cross-country grievances, c) relevant agencies for action including investigators, rescue centres, in-country children's departments, legal aid actors, health facilities, counselling support service providers for GBV related grievances.

6. Communication and Agreement with Complainant: The Grievance Manager will communicate the proposed response to the complainant in an appropriate language and means (face to face, by phone, email). All communication must be recorded, dated, and provide for reply and sign- off by the complainant.

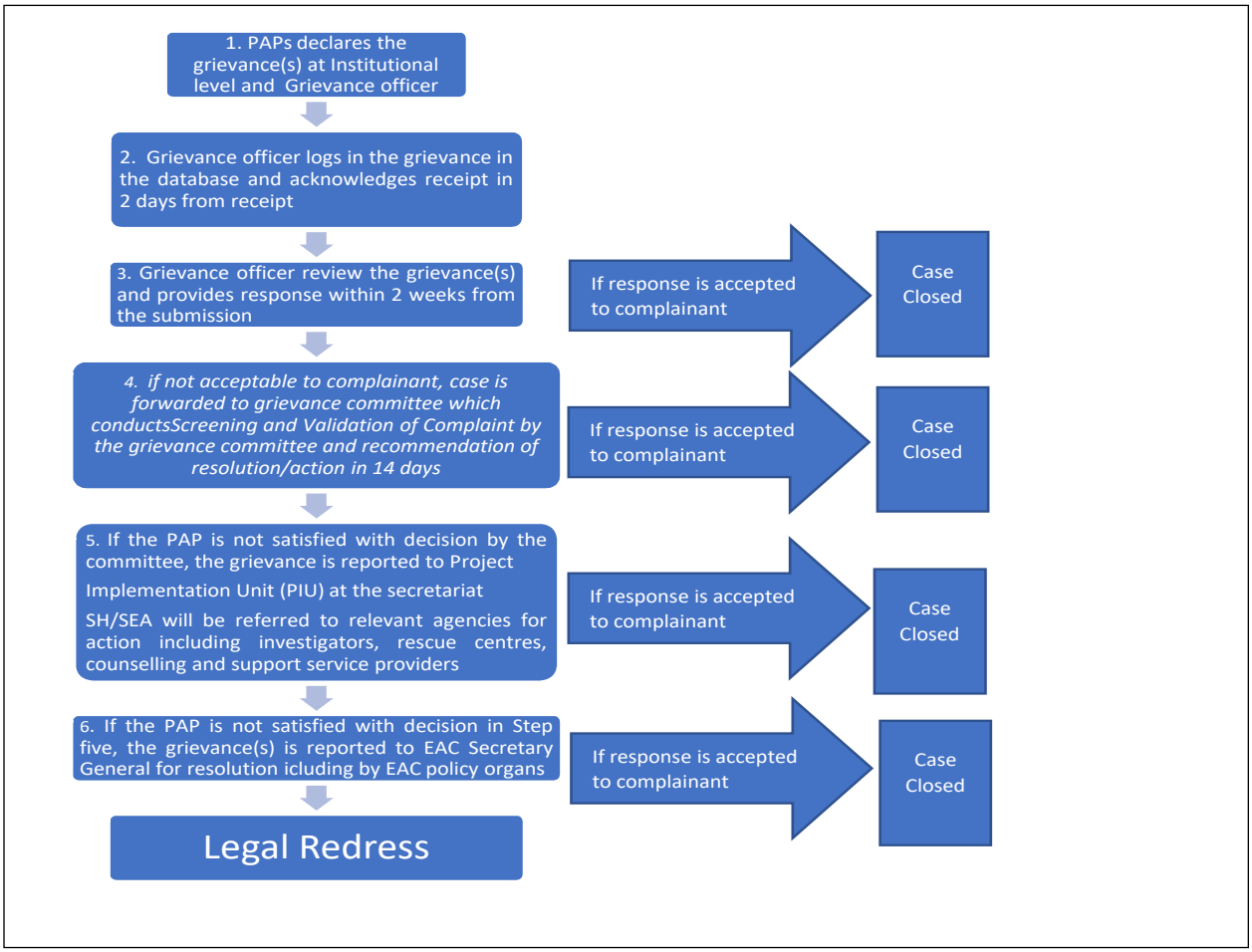
7. Appeal Mechanism: The Project GRM provides an appeal mechanism for complainants who may not be satisfied with the resolutions by partners' mechanisms. Where the complainant challenges the suitability of a finding, rejects a proposed action, or is not keen on participating in the process. The grievance manager will inform the complainant of available alternatives, whether through the judicial system or other administrative channels, and clearly document the decision taken by the complainant and the reasons.

8. Implementation of Agreed Actions: Where there is an agreement between a complainant and the grievance manager to proceed with the agreed action the response will be implemented through a process managed by GRC, and investigations will be supervised by the grievance manager.

   Where it is not possible to reach an agreement with the complainant on the proposed response, the grievance committee will review the situation with the complainant and determine whether a modification of the response might meet the concerns of the complainant, the organization, and other stakeholders. The Grievance Manager will inform the complainant about other available alternatives, including the use of judicial or other administrative mechanisms for dispute resolution. The grievance manager will document the discussions with and choice of the complainant in the database.

9. Closeout: The final step is to close out the grievance. If the response accepted by the complainant, the Grievance Manager will document the satisfactory resolution and report the results to relevant stakeholders. This feedback shall be captured in the database.

Figure 2 GRM Process



Monitoring

Effectiveness of the GRM should be monitored on a regular basis. This is important because it helps find solutions to challenges as they arise and dealing with them promptly. Some of the measures put in place for this include a quarterly report on the number of grievances received, those resolved and the ones outstanding to ensure there is a continuous flow of the project. This will be undertaken and reported to PIUs. As part of stakeholder engagement and consultation, involving the views of the stakeholders for whom the Grievance Mechanism is designed will be part of PIU Monitoring.

World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a World Bank (WB) 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's 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.

STAKEHOLDER ENGAGEMENT MONITORING AND EVALUATION

Inclusive and participatory monitoring and evaluation is also necessary to minimize misconceptions and misunderstandings about the programme and maintain a positive perception about the programme and projects.

Stakeholder Engagement monitoring involves collecting data, assessing the level of engagement and using insights from the data collection to adjust strategies and tactics for engaging effectively with stakeholders. These will be responsibility of PIU at the secretariat in collaboration with NSOs in the partner states.

Monitoring will verify:

i). The socio-economic and environmental impacts of the programme;

ii). Compliance and effectiveness of the **SEP and the ESCP** and application of the recommended standards, stakeholder engagement and implementation of the grievances redress mechanism

Annual reviews of the project and the implementation of the E&S instruments will be conducted at the end of each year. The monitoring reports for E&S implementation will be prepared by the PIU and will be used as a monitoring and review tool to track effectiveness. In the review process, the PIU and partner states will play the lead role in coordinating the process with key stakeholders.

Management Functions and Responsibilities

Adequate institutional arrangements, systems and resources will be put in place to monitor the implementation of the SEP. The main monitoring responsibilities will be with the PIU. This will be led by the PIU E&S Specialist with the assistance of the Communications and Outreach Specialist. The PIU Project Manager will be overall responsible for the implementation of the environmental and social mitigation measures, including the SEP, as well as for monitoring and inspections for compliance with the SEP.

The Project's M&E Plan will include monitoring indicators for the measurement of the performance of the SEP.

The PMU will collect all reporting, as well as its own findings, and produce an overall environmental and social progress report, which will contain a distinct section of stakeholder engagement and which will be provided to the World Bank. The project will follow a quarterly reporting cycle. These quarterly reports will further be shared with all stakeholders, as defined in the SEP.

Monitoring and Evaluation

The programme will establish and maintain a database and activity file detailing public consultation, disclosure information and grievances collected throughout the program, which will be available for public review on request. Stakeholder engagement shall be periodically evaluated by the PIU. The following indicators will be used for evaluation:

i). Quarterly grievances received, speed of resolution and how they have been addressed; and
ii). Level of involvement and participation of stakeholders including project affected people (disaggregated by gender and vulnerable groups).
iii). Incidents and accidents

Reporting

The PIU will prepare and regularly avail important information on project status to stakeholders (based on information need) including project implementation progress, actions on commitments made to various stakeholders and any new or corrected information since the previous report. Table 5 outlines some of the reports, target audience, method of correspondence and timelines.

Table 5 Methods and frequency of reporting to stakeholders

Reporting Party	Reporting Method	Stakeholder	Reporting Information	Frequency
Project Implementation Unit (PIU)	Official Correspondence Correspondence by email or postal mail Website and social media	Ministries & Agencies NSAs	Project progress Plans for next steps Issues and changes	Quarterly

Stakeholder Monitoring Plan

Stakeholders' engagement plan shall be developed and implemented in the project, and shall aim at identifying the key stakeholders, their roles in the program, and form and frequency of engagement over the project cycle. Further, monitoring will be done to assess overall progress in implementation, and if implementation is as per the plan, any challenges and lessons learnt in the process of implementation and possible corrections. The monitoring results will be made available to the stakeholders for review and comments in an accessible place, mainly at the project level for transparency.

Table 6 Stakeholder Monitoring Plan- SEP

No.	Program Phase	Type of Stakeholder	Consultation Method	Expected Outcome	Monitoring Indicator
	Planning and Assessment	Implementing institutions	meetings, Information Education and Communication (IEC) Materials	Full participation of Institutions on design and implementation	Report of the meetings
		PAP, OIPs, Vulnerable	Meetings, Information	Extends program knowledge to	Disseminated materials

No.	Program Phase	Type of Stakeholder	Consultation Method	Expected Outcome	Monitoring Indicator
		individuals	Education and Communication (IEC) Materials	beneficiaries	
		Ministries of partner states, Development Partners (DPs)	Information sharing, meetings, workshops	Attain needed support from other stakeholders, systematic engagement of stakeholders	No of consultations, Report of the meetings
		ALL	Publication of environmental and social documents in the website	Informed all interested parties on the activities to be undertaken	Documents published on the website No. accessing the documents on the site
	Implementation phase	implementing institutions	Meetings, Information Education and Communication (IEC) Materials	Full participation on design, implementation and participatory monitoring	Disseminated materials, implementation reports
		PAPs, OIPs, Vulnerable individuals	meetings, Information Education and Communication (IEC) Materials, FGD	Full participation in Project design, implementation and monitoring.	Disseminated materials

Reporting Back to Stakeholder Groups

Results of stakeholder engagements, will be regularly reported back to the stakeholders. It will be the responsibility of the PIU to ensure that all relevant reporting is shared through the above defined public means.

Annex 1: List of Stakeholders to be Engaged

Topic	Burundi	Kenya	Rwanda	South Sudan	Tanzania	Uganda
Data protection	Ministry of Communication, Information Technologies and Media	Office of the Data Protection Commissioner (ODPC)	National Cyber Security Authority (NCSA)	Ministry of Information, Communication Technology and Postal Services	Tanzania Communications and Regulatory Authority (TCRA)	Data protection office, under National Information Technology Authority - Uganda (NITA-U)
Electronic signatures		Communications Authority of Kenya	Rwanda Utilities Regulatory Authority (RURA) Rwanda Information Society Authority (RISA) Government Certificate Authority (GovCa)	Ministry of Trade and Industry	Ministry of Information, Communication and Information Technology	Ministry of Information and Communications Technology National Information Technology Authority - Uganda (NITA-U)
E-transactions			Central Bank of Rwanda (BNR) Rwanda Utilities Regulatory Authority (RURA)			Ministry of Information and Communications Technology

Topic	Burundi	Kenya	Rwanda	South Sudan	Tanzania	Uganda
E-commerce			Ministry of Trade and Industry	Ministry of Trade and Industry South Sudan Consumer Protection Council		Ministry of Information and Communications Technology Ministry of Trade, Industry and Cooperatives
National digital ID	Ministry of Interior, Community Development and Public Security	Huduma Namba	National Identification Agency (NIDA) under Ministry of ICT and Innovation	Ministry of Internal Affairs	National Identification Authority (NIDA)	National Identification and Registration Authority (NIRA) under the Ministry of Internal Affairs
Cybercrimes		National Computer and Cybercrimes Coordination Committee (NC4)	National Cyber Security Authority (NCSA)	National Communication Authority	Tanzania Communications and Regulatory Authority (TCRA)	National Information Technology Authority - Uganda (NITA-U)
Cybersecurity		Communications Authority of Kenya			Tanzania Computer Emergency Response Team	National Information Technology Authority - Uganda (NITA-U) Uganda National CERT
DFS	Bank of the Republic of Burundi Telecom Regulation and Control Agency	Central Bank of Kenya	National Bank of Rwanda	Bank of South Sudan	Bank of Tanzania	Bank of Uganda

Topic	Burundi	Kenya	Rwanda	South Sudan	Tanzania	Uganda
Digital media and content	Ministry of Communication, Information Technologies and Media Telecom Regulation and Control Agency National Communication Council	Communications Authority of Kenya	Rwanda Utilities Regulatory Authority (RURA) Ministry of ICT and Innovation	National Communication Authority	Tanzania Communications and Regulatory Authority (TCRA)	Ministry of Information and Communications Technology
Competition	Competition Commission (*to be established*)	Competition Authority of Kenya (CAK)	Rwanda Inspectorate, Competition and Consumer Protection Authority Rwanda Utilities Regulatory Authority (RURA)	Ministry of Trade and Industry	Fair Competition Commission	*No general competition framework.* *Development of a future general competition framework would likely be led by the Ministry of Trade, Industry and Cooperatives or the Ministry of Finance, Planning and Economic Development*

Topic	Burundi	Kenya	Rwanda	South Sudan	Tanzania	Uganda
Telecom	Ministry of Communication, Information Technologies and Media Telecom Regulation and Control Agency National Communication Council	Communications Authority of Kenya	Rwanda Utilities Regulatory Authority (RURA) Ministry of ICT and Innovation	Ministry of Information, Communication Technology and Postal Services National Communication Authority	Ministry of Information, Communication and Information Technology Tanzania Communications and Regulatory Authority (TCRA)	Uganda Communications Commission
Fiscal[1]	Burundian Revenue Authority (OBR)	Kenya Revenue Authority	Rwanda Revenue Authority	South Sudan National Revenue Authority	Tanzania Revenue Authority	Uganda Revenue Authority

Annex 2: Grievance Registration Form and Grievance Resolution Form

GRIEVANCE RECEIPT AND RESOLUTION FORM

Grievance/Complaint Registration Number…….. Date……

A. COMPLAINANT

Important information of the Complainant

First Name ..... Middle Name ..... Last Name: .....

Occupation: .....Tittle.....

Address: .....

Mob. Phone..... E-mail: .....

Who is complaining?

Project Affected Persons (PAPs).....

Specific PAPs are:

Institution staff.....

Student .....

Representative of complainant…….

Others .....

Technicians .....

B. EXPLANATION OF THE GRIEVANCES

Source of Grievance/Complaint.....

Brief explanation of the Grievance/Complaint emanating from the project implementation....

.....

.....

Event/person being complained about

.....

.....

Place where the event occurred .....Date of the event .....

Have you ever filed the same grievance before? .....Yes..... .....No.....

C: LODGING THE GRIEVANCE/COMPLAINT

Method used to lodge the grievance/complaint

Letter Phone Face to face E-mail

Others (Mention).....

Name of Person registered and filed the complaint

Name……. Position……. Date…….

Agreed time frame for feedback on the processed grievance/complaint:

Immediately (b) Three days (c) One week (d) Two weeks

GRIEVANCE/COMPLAINTS RESOLUTION

Date of conciliation session.....

Was the complainant present? **Yes** **No**

Was field verification of complaint conducted? **Yes** **No**

Findings of field investigation

……..
……
Summary of Conciliation Session
……
Was agreement reached on the issues? **Yes** **No**
If agreement was reached, give the details of the agreement
……..
……
If agreement was not reached, specify the points of disagreement and promise given to the client
…….
……

Signed (Arbitrator/ Complaints handling Officer-GHO): ……..…Date.....
Signed (Complainant).....Date.....
Signed (Independent Observer) .....Date.....

ANNEX 3: List of Stakeholders Engaged in Preparation Phase

Table 7 List of stakeholders engaged in validation workshop 26-30 September 2022

No.	NAME	POSITION
East African Community (EAC)		
1.	Mr. Obura Carolos E. Assai	Deputy Director for Entrepreneurship, Ministry of Trade and Industry, The Republic of South Sudan
2.	Dr. Fred Simiyu	Ag. Director, Research and Trade Policy Analysis, State Department of Trade and Enterprise Development, Ministry of Industrialization, Trade and Enterprise Development, The Republic of Kenya
3.	Mr. Leonidas Ndayahundwa	Head of Legal and Consumer Protection Affairs, Telecommunications Regulatory and Control Agency, The Republic of Burundi
4.	Mr. Sosthene Bwigenge	Smart Cities and Communities Outreach Specialist, Ministry of ICT and Innovation, The Republic of Rwanda
5.	Mr. Samuel Walusimbi	Systems Administrator, Ministry of East African Community Affairs, the Republic of Uganda
6.	Eng. Peter Mwasalyanda	Assistant Director for ICT Systems and Service Development, Ministry of Information, Communications and Information Technology, the United Republic of Tanzania
7.	Pantaleo Kessy	Principal Physical Policy EAC
8.	Gabriel Kinu	ICT Expert Customs EAC
9.	James Kivuva	Senior Meteoroligist EAC
10.	Aileen Mallya	Webmaster EAC
11.	Alexis Songorwa	Senior Accountant EAC
12.	Damaris W Nyaga	Resource Mobilization Officer
13.	Aime Vwase	Acting Director Planning EAC
14.	Maria Sembua	IT Officer Trade Uganda
15.	Sarah Kabaluna	Communication Expert EAC
16.	Irene Charles Isaka	Director Social Sector EAC
17.	Pascal Mbayahaca	ICT Central Bank Burundi
18.	Edna Mbasa	ICT EALA Legislative Assembly
19.	Jean Paul	Chief Digital Officer Ministry of Trade Uganda
20.	Ngezi K	Chief Digital Officer
21.	Faith Didas Matoli	Ministry of Information Communication and IT
22.	Jean Bosco Ndikumana	Board Advisor in charge of Payment Systems
23.	Alice Zanza	Senior Financial Sector Specialist
24.	Zaid Mkangwa	East African Health Research Commission
25.	Opiyo Andrew Nyawango	Director of ICT
26.	Daniel Murenzi	Chief Principal Information Technology Officer - EAC

The below stakeholders were consulted during the World Bank mission to South Sudan from 21-25 February 2022.

Table 8 Stakeholders consulted during mission in February 2022

DE4A Technical Committee

	Name	Affiliation
1	Dr. Lado Wani Kenyi, Undersecretary	MICT&PS
2	Napoleon Adok, Director General	NCA
3	Papiti Okwaci, CEO	South Sudan International Gateway (SSIG)
4	Thomas Gatkuoth, Director General of Telecommunications	MICT&PS
5	Branya Jibi, Director of IT	MICT&PS
6	Chol Mayen, Director of Technical Services	NCA

Key Stakeholders Consulted

S No.	Session	Affiliation/Entity Represented
1	**DE4A Kick-off/ Orientation**	DE4A Committee – Government of the Republic of South Sudan (GRSS) including MICT&PS, NCA, SSIG
2	**Understanding ICT structure, priorities, and plans**	DE4A Committee – Government of the Republic of South Sudan (GRSS) including MICT&PS, NCA, SSIG
3	**Regional integration; Horn of Africa Initiative**	DE4A Committee – Government of the Republic of South Sudan (GRSS) including MICT&PS, NCA, SSIG
4	**Donor Partners and Multilateral efforts**	1. United Nations Development Programme (UNDP) 2. UNESCO 3. UN Women 4. GIZ 5. JICA 6. South Sudan Internet Governance Forum 7. African Development Bank
5	**South Sudanese Business Associations/Ministries/Authorities**	1. South Sudan Chamber of Commerce, Industry, and Agriculture 2. Ministry of Trade and Industry
6	**Universities and Educational Centres**	1. University of Juba 2. Kampala University
7	**Telecom Providers**	1. MTN 2. ZAIN 3. Digitel
8	**Insurance Providers**	1. UAP 2. Britam 3. Baping
9	**Accelerators, Incubators, start-ups, early-stage tech businesses, and digital training providers**	1. Dynamic Consult 2. Komax Consult 3. Komakech Denis Don 4. Koneta Hub 5. JICTS 6. Foundation for Youth Initiative (FYI)

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		5. ATXNET Ltd
25	**Foreign Exchange, taxation and accounts**	1. Bank of South Sudan 2. National Revenue Authority

10	**Public Commercial Banks**	1. Alpha Bank 2. Cooperative Bank South Sudan
11	**ISP**	1. Liquid Intelligent Technologies 2. Muya 3. RCS – Radio & Satellite Communication Limited 4. Eden Technologies Ltd 5. IPTEC Limited
12	**Digital Public Platforms**	1. Ministry of Public Service and HRD 2. Ministry of Labour
13	**Private Commercial Bank**	1. Kush Bank 2. Ecobank South Sudan 3. Kenya Commercial Bank
14	**ISP**	1. Horizon IT Solutions Limited 2. DishNet Africa Limited 3. Fast Network Limited 4. Supernet Limited 5. 4G Telecom Limited
15	**Education Sector overview**	1. Ministry of General Education and Instruction
16	**Fintech Players and Digital Businesses**	1. Trinity Technologies 2. Linkspay 3. South Sudan Women Finance 4. Vision Capital
17	**Telecomm Regulator and Implementing Authorities**	1. National Community Authority (NCA) 2. Universal Service and Access Fund (USAF) 3. South Sudan International Gateway (SSIGW)
18	**Digital Businesses**	1. Agoro 2. Sosuda Tech 3. Nileboda
19	**E-service platforms**	1. Crawford Capital Limited 2. Ministry of Interior
20	**ISP**	1. Smart Network Limited 2. Deltanet Co Ltd (Deltnet Fiber) 3. ATX Net 4. Voda Network System Limited
21	**Education Sector**	1. Ministry of Higher Education, Science, and Technology 2. University of Juba
22	**Gender Priorities in ICT**	1. Ministry of Gender, Social Welfare, and Religious Affairs 2. GoGirls ICT Initiative 3. UN Women 4. South Sudan Women's Entrepreneurs' Association 5. South Sudan Women Finance
23	**Cyber Security**	1. NCA 2. MICT&PS
24	**ISP**	1. Pivotal System Ltd 2. Talia 3. Nile Fibertech Company Limited 4. Tonlect Enterprise (SSND) Co Ltd

The following stakeholders were consulted during the World Bank mission to Addis Ababa and South Sudan from 30 August – 30 September 2022.

Table 9 Officials met during Mission

S/No.	NAME	POSITION, ORGANIZATION
1	Hon. Dr. Jacob Maiju Korok	Deputy Minister, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
2	Dr. Lado Wani Kenyi	Undersecretary, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
3	Mr. Thomas Gatkuoth Nyak	Director General of Telecom, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
4	Mr. Peter Ajang Nyibong	Director General of Planning, MOFP
5	Mr. Papiti Okwaci Nyilek Ajak	CEO, South Sudan International Gateway (SSIGW)
6	Mr. Chol Joseph Mayen Dut	Director of Technical Services, National Communication Authority (NCA)
7	Mr. Henry Owera Bakata	Deputy Director of Policy, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
8	Mr. Gabriel Gong Baak Madut	Assistant Director of Aid Coordination, Ministry of Finance and Planning (MoFP)
9	Ms. Alma Gabriel Korsuk	Ministry of Higher Education, Science and Technology (MoHEST)
10	Mr. Kennedy Alfred Remo Musa	Commissioner of ICT, National Revenue Authority (NRA)
11	Mr. Kenyi Alex Simon Monokoteng	Director of Accounts, Ministry of Information, Communication Technology and Postal Services (MICT&PS)
12	Mr. Tereka Moses Lumori	Senior Inspector of Procurement, Ministry of Information, Communication Technology and Postal Services (MICT&PS)