



KINGDOM OF ESWATINI

DIGITAL ESWATINI

(P508948)

AS PHASE II OF THE MULTI-PHASE PROGRAMMATIC APPROACH

INCLUSIVE DIGITALIZATION IN EASTERN AND SOUTHERN
AFRICA (IDEA)

STAKEHOLDER ENGAGEMENT PLAN

DRAFT VERSION

August 05, 2025

Abbreviations and Acronyms

| | |
|--------|---|
| CSO's | Civil Society Organizations |
| CMS | Central Medical Stores |
| ESF | Environmental and Social Framework |
| ESMP | Environmental and Social Management Plan |
| ESCP | Environmental and Social Commitment Plan |
| E&S | Environmental and Social |
| EPTC | Eswatini Post and Telecommunications Corporation |
| GBV | Gender Based Violence |
| IDEA | Inclusive Digitalization in Eastern and Southern Africa |
| MICT | Ministry of Information Communication and Technology |
| MoF | Ministry of Finance |
| MPA | Multi-Phase Programmatic Approach |
| NGOs | Non-Governmental Organizations |
| PIU | Project Implementation Unit |
| SEA/SH | Sexual Exploitation and Abuse/Harassment |
| SEP | Stakeholder Engagement Plan |
| TOR | Terms of Reference |
| WB | World Bank |

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1. Introduction

The project is aligned with the regional integration agenda and advances the IDEA-MPA mission. Scale-up of digital networks will contribute to building a larger digital market, which will allow to capture economies of scale and aid in positioning Eswatini as an attractive market for private investment, including in wholesale sector. The project is Phase 2 of IDEA MPA, contributing to IDEA's target of ensuring at least 180 million people in Eastern and Southern Africa (AFE) have access to and use broadband internet, and 100 million have digital IDs and adopt digitally enabled services. Three components are proposed for the Eswatini operation, including: **Component 1- Affordable Broadband** which aims to expand access to affordable broadband connectivity through a sequential roadmap of reform; **Component 2- Government in Your Hand**, will support uptake of connectivity via complementary interventions e.g., digitalizing of health and education services to be provided via connected institutions; and **Component 3 - Program Management and Capacity Building** will finance the recipient's project management and coordination capacity, including Procurement, FM, M&E, and ESS management.

The project will benefit citizens, targeting specifically youth and women, businesses, and public sector Ministries, Departments, and Agencies

The Digital Eswatini Project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

2. Objective of SEP

This SEP outlines the strategy for engaging stakeholders throughout the lifecycle of the Digital Eswatini Project, which aims to expand broadband access and improve digital public services across Eswatini. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project. The involvement of all stakeholders is essential to the success of the Project to ensure and to minimize and mitigate environmental and social risks related to the proposed project activities. Specifically, the SEP objectives are to:

- Ensure inclusive and meaningful engagement with stakeholders.
- Provide timely and accessible information.
- Facilitate feedback and grievance resolution.
- Strengthen trust and transparency in project implementation.

3. Stakeholder identification and analysis

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

to participate and those who may be differentially or disproportionately affected by the project because of their marginalized or vulnerable status. It is also important to understand how each stakeholder may be affected – or perceives they may be affected – so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner. Stakeholders will be identified on a continuing basis

3.1 Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- ✓ Openness and life-cycle approach: Public consultations for the HEPRR Program will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- ✓ Informed participation and feedback: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- ✓ Inclusiveness and sensitivity: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- ✓ Flexibility: If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibit traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communication.

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

- **Affected Parties** – persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;

- **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and

- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status⁴, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

3.2. Affected parties and other interested parties

To ensure relevant and meaningful engagement, project stakeholders can be divided into three main groups: Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Local Communities: Especially those near fiber optic installation sites, including urban and rural residents.
- Educational and Health Institutions: 859 schools and 134 health centers to be connected.
- Tinkhundla Centers: 38 administrative hubs receiving last-mile connectivity.

Other Interested Parties

- Government Agencies: Ministry of ICT, Eswatini Post and Telecommunications Corporation (EPTC), Royal Science and Technology Park.
- Civil Society Organizations: Groups focused on digital inclusion, privacy, and community development.
- Private Sector: Telecom providers, contractors, and digital service vendors.
- Development Partners: Donors and technical assistance providers.

3.3. Disadvantaged/vulnerable individuals or groups

The project recognizes the need to reach and ensure the inclusion of vulnerable or disadvantaged persons and groups who may be disproportionately impacted, further disadvantaged by the project, or unable to take advantage of project benefits, as compared with any other groups, and may face barriers to accessing information or other project benefits. Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following:

- Persons with Disabilities
- Rural female-headed households
- Retired pensioners
- Elderly
- Youth

These people/groups may require specific engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate to ensure that these people are identified and meaningfully consulted. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

4. Stakeholder Engagement Program

4.1. Summary of stakeholder engagement done during project preparation

On August,08, 2025, consultations were conducted with central government and institutional stakeholders relevant to the implementation of the project. The consultation objectives were to: a) inform Stakeholders about the Project; b) identify any potential unforeseen environmental, social, health, or safety risks that the project might induce and c) environmental and social framework instruments prepared for the project; and (iv) inform about the grievances mechanism to be established for the project.

The consultations were conducted by Ministry of ICT with the participation of the representatives of EPTC, Home Affairs and World Bank E&S consultants. The consultation comprised of 06 participants. The feedback from the consultation was positive and stakeholders were supportive of the project. Participants were given opportunity to share their concerns, in which were particularly related to: the need to conduct extensive consultations with stakeholders, including chiefs and community leaders, to address any social issues; Potential environmental and social risks and the development of its management plans.

4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

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

4.3. Stakeholder engagement plan

| Project Stage | Topic of Consultation/ Message | Method Used | Target Stakeholders | Responsibilities |
|-------------------|---|---|---|---------------------|
| Preparation stage | <ul style="list-style-type: none"> ✓ Present the project and receive feedback on project activities. ✓ Present E&S key risks ✓ Give information on GRM ✓ Sensitize communities on upcoming project interventions and how to minimize Project negative impacts. ✓ Give information on GRM | <p>Consultive workshop including a PowerPoint presentation.</p> <p>Online consultations and digital surveys</p> <p>Distribution of leaflets and brochures (around construction sites); public notices, press releases in the local media</p> <p>Community meetings and focus groups (urban and rural).</p> <p>Stakeholder workshops and exhibitions.</p> <p>Targeted outreach to vulnerable groups via local leaders and NGOs.</p> | <p>Government representatives,</p> <p>Women, Children, Elderly, Disabled communities and Vulnerable groups</p> | <p>MICT and PIU</p> |

| | | | | |
|----------------------|--|--|--|--------------|
| Implementation Stage | <ul style="list-style-type: none"> ✓ Project's progress, ✓ Anticipated risks and E&S instruments under implementation ✓ Compliance monitoring and supervision findings ✓ GRM dissemination and awareness | Consultative workshops/Face-to-face meetings including focus group discussions | Key identified stakeholders (including Civil Society Groups, Women's groups, Communities, vulnerable and disadvantaged groups) | MICT and PIU |
|----------------------|--|--|--|--------------|

Proposed Strategy for information disclosure

Prior to project appraisal, a Stakeholder Engagement Plan (SEP) and an Environmental and Social Commitment Plan (ESCP) will be publicly disclosed. Throughout project implementation, Environmental and Social Management Plans (ESMPs), Grievance Redress Mechanism (GRM) procedures, and regular progress reports will be made available.

All documents will be accessible on the World Bank website and a dedicated project website. Printed copies of the Environmental and Social Framework (ESF) instruments will be available at the Project Implementation Unit (PIU) offices and updates to the instruments will be shared at local government offices and through community channels.

4.4. Reporting back to stakeholders

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, and on the project's overall implementation progress. The project will ensure a two-way communication with the stakeholders.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources, management functions and responsibilities

As part of the implementation arrangements, the PIU will be hosted at MICT. The PIU will be responsible for all components (except comp 1, sub-component 1b which will be implemented by EPTC) including overseeing project-related fiduciary functions and M&E and environmental and social commitments. MICT will allocate adequate budgetary resources for the implementation of the SEP throughout the project period. An Environmental and Social Specialist will be appointed as part of the PIU within the timeframe stipulated in the ESCP for the duration of the project and will be responsible for: a) organizing workshops or meetings to facilitate constructive dialogue between different stakeholder groups, address concerns, and build consensus; b) ensure relevant stakeholder engagement activities in SEP are implemented in a timely manner; c) share with stakeholders involved, information on GRM of the project; and d) support the development, implementation, and monitoring of all stakeholder engagement activities for Digital Project. The contractors are required to comply with SEP provisions. The table below is an estimated budget for SEP implementation.

Table 1: Stakeholder Engagement Budget

| Activity | Timeline 2025-2030 (Costs in USD) |
|---|--------------------------------------|
| Training for Health workers | 70.000 |
| Training for PIU on implementation of SEP (ESF, GRM, effective communication, cultural sensitivity) | 70.000 |
| Stakeholder engagement activities- consultations, venue rentals, equipment rentals, dissemination, radio, meetings etc. | 90.000 |
| GRM - Dissemination of instruments, boxes, printing material | 70.000 |
| Monitoring visits - Travel and logistics for PIU or to oversee engagement activities | 80.000 |
| Total | 380.000 |

6. Grievance Redress Mechanism

The main objective of a GRM is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The Digital Project's GRM will be a central part of stakeholder engagement and the environmental and social safeguards processes. It is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination), within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level. GRM aims to:

- ✓ Provide affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of the project.
- ✓ Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.
- ✓ Supports accessibility, anonymity, confidentiality and transparency in handling complaints and grievances.
- ✓ Avoids the need to resort to judicial proceedings Register, Categorize, and prioritize grievances.
- ✓ Respond and address the grievances via consultation with all stakeholders.
- ✓ Forward any unresolved cases to the relevant authority.

The GRM sets out the steps to be taken to resolve grievances and its management will be under Ministry of Information Communication and Technology (MICT) responsibility through the PIU. Dedicated channels to submit complaints will be created including hotline, email, physical drop-boxes, and online portal. - GRM will be operational prior to implementation and monitored quarterly.

Any person or group of people who have a relationship with the project or are affected by its activities can raise a question, grievance, or complaint. The project will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH. SEA/SH complaints will be handled through survivor-centered protocols.

The Project recognizes the different types of workers that will be involved in project activities. Effective grievance redress mechanism for addressing and managing workplace and employment related conflicts or complaints as well as GBV is crucial for the Project. Typical workplace grievances include demand for employment opportunities; labor wage rates; delays of payment; disagreement over working conditions; and health and safety concerns in the work environment. A grievance structure will be established for project workers (direct workers and contracted/supply workers), as required in ESS2.

6.1. Description of GM

| Step | Description of Process | Time Frame | Responsibility |
|-----------------------------|---|---------------------------------------|----------------|
| GM implementation structure | Establish a mechanism for different levels- Project Level and Community Level | Before Project Implementation | MICT/ PIU |
| Grievance uptake | Grievances can be submitted via the following channels: [telephone hotline | Throughout the project implementation | MICT/ PIU |

| Step | Description of Process | Time Frame | Responsibility |
|-------------------------------------|--|---------------------------|------------------------------|
| | E-mail Letter to Grievance focal points at local facilities Complaint form to be lodged via any of the above channels Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box] Grievance or suggestion boxes located at project implementing sites. | | |
| Sorting, processing | Any complaint received is logged by GRM focal points and shared with PIU | Upon receipt of complaint | Local grievance focal points |
| Acknowledgment and follow-up | Receipt of the grievance is acknowledged to the complainant by PIU/ E&S specialist | Within 2 days of receipt | Local grievance focal points |
| Verification, investigation, action | Investigation of the complaint is led by MICT A proposed resolution is formulated by MICT/PIU and relevant stakeholders and communicated to the complainant by PIU. | Within 10 working days | MICT/ PIU |
| Monitoring and evaluation | Data on complaints will be collected by PIU or in logbook and reported to MICT quarterly | On going | Contractors/supervision firm |
| Provision of feedback | Feedback from complainants regarding their satisfaction with complaint resolution is collected by PIU | Within 10 days | PIU |
| Training | Training for GRM focal points, and PIU officers on project level GRM. | As per needed basis | PIU |

World Bank Grievances Redress System

Communities and individuals who believe that they are adversely affected by the 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 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, because 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 allowed 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/GRS>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

7. Monitoring and Reporting

7.1. Summary of how SEP implementation will be monitored and reported

During the Project implementation phase, PIU will prepare quarterly reports to be shared with World Bank. These reports will include summarized and updated information on the implementation of the stakeholder engagement activities, GRM usage and resolution status and indicator-level reporting on grievances. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in the E&S section of the normal reporting cycle for the Project.

The following KPIs will be monitored:

- Number of consultation activities and other public interactive engagements with stakeholders conducted within a reporting period (e.g. quarterly, or annually).
- Frequency of public engagement activities.
- Number of participants in different engagement activities (where applicable)
- Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
- Type of public grievances received; and
- Number of press materials published/broadcast by type of media.

Annex 1- Stakeholder Mapping Matrix

| Stakeholder Group | Interest in Project | Potential Impact | Engagement Strategy |
|--------------------------|---------------------|------------------|-------------------------|
| Local Communities | Access to broadband | High | Community meetings |
| Schools & Health Centers | Improved services | High | Direct outreach |
| Tinkhundla Centers | Connectivity | High | Workshops |
| Ministry of ICT | Implementation | High | Coordination meetings |
| EPTC | Infrastructure | High | Technical consultations |
| Civil Society | Digital inclusion | Medium | Focus groups |
| Private Sector | Service provision | Medium | Business forums |
| Development Partners | Funding & TA | Medium | Donor coordination |

Annex 2- Attendance Register

| NAMES | ORGANISATION | DESIGNATION | CONTACTS |
|---------------------|---------------------|-----------------------------|-------------------------------|
| Bongani Magagula | EPTC | Enginner project & Planning | magagulab@sptc.co.sz |
| Musa Mabuza | EPTC | Senior Engineer | |
| Gugu Msane | MICT | Senior Scientist | |
| Bonga Ndlangamandla | MICT | Director of e-government | bonga.ndlangamandla@gmail.com |
| Sanele Khumalo | EPTC | | |
| Ayanda Dlamini | Home Affairs | | |
| Lomaqhawe Dlamini | Home Affairs | | |
| Ms Maseko | Home Affairs | | |

Annex 3 - Engagement Schedule

| Activity | Timeline | Responsible Party |
|-----------------------|-----------------------|--------------------------|
| Initial Consultations | Pre-Appraisal | PIU |
| Disclosure of SEP | Pre-Appraisal | PIU |
| Community Meetings | Quarterly | E&S Specialist |
| Online Surveys | Bi-annually | PIU |
| GRM Setup | Before Implementation | PIU |
| Monitoring Reports | Quarterly | PIU |

Annex 4- GRM Flowchart

- Complaint Received (via hotline, email, drop-box, portal)
- Complaint Logged in GRM System
- Initial Assessment by E&S Specialist
- Referral to Relevant Authority (if needed)
- Resolution and Feedback to Complainant
- Closure and Documentation
- Quarterly Review and Reporting