

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF EDUCATION, SCIENCE AND TECHNOLOGY



VULNERABLE GROUPS PLANNING FRAMEWORK

FOR

Tanzania Secondary Education Quality Improvement Project (SEQUIP)

Financed by the WORLD BANK

DRAFT IN PREPARATION

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ABBREVIATIONS:

AEP	Alternative Education Pathways
CBO	Community Based Organization
CLO	Community Liaison Officer
CSOs	Civil Society Organization
CDO	Community Development Officer
CMC	Community Management Committees
CMT	Council Management Team
CPD	Continuous Professional Development
CPF	Country Partnership Framework
DLI	Disbursement Link Indicators
EPforR	Education Program for Results
ESDP	Education Sector Development Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
FFBEP	Fee Free Basic Education Policy
FGD	Focus group discussion
FPIC	Free, Prior and Informed Consent
FYDP	Five Year Development Plan
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
ICT	Information Communication and Technology
LGA	Local Government Authorities
M and E	Monitoring and Evaluation
MoEST	Ministry of Education, Science and Technology
NGO	Non-Governmental Organizations
PCN	Project Concept Note
PO RALG	Presidents' Office, Regional Administration and Local Government
RAS	Regional Secretariat
PAP	Project Affected Persons
PRA	Participatory Rural Appraisal
SA	Social Assessment
SCC	School Construction Committee
SCT	SEQUIP Coordination Team
SEA	Sexual Exploitation and Abuse
SEP	Stakeholders Engagement Plan

SGC	SEQUIP Grievance Committee
SEQUIP	Secondary Education Quality Improvement Project
SMPE	Social Management Plan Expert
SSMT	SEQUIP Senior Management Team
TITCS	Teacher In-service Training Service
ToR	Terms of Reference
URT	United Republic of Tanzania
VCs	Village Councils,
VGs	Vulnerable Groups
VGP	Vulnerable Groups Plan
VGPF	Vulnerable Groups Planning Framework
WASH	Water Sanitation and Hygiene
WB	World Bank

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EXECUTIVE SUMMARY

The Project

The Government of United Republic of Tanzania (URT) in collaboration with the World Bank has prepared the Secondary Education Quality Improvement Project (SEQUIP). The objectives of SEQUIP are 'To increase access to secondary education, provide responsive learning environments for girls and improve completion of quality secondary education for girls and boys'.

In summary activities under SEQUIP will be structured into four main components:

Component 1: Empowering Girls Through Secondary Education and Life Skills

1.1 Creating Safe Schools: Implementation of the Safe Schools Program including: (i) trained school guidance and counseling teachers; (ii) students' life skills training; (iii) in-service training on the teacher code of conduct and gender sensitive pedagogical approaches; (iv) training of school heads and School Boards on Gender Based Violence, safe school issues etc.; (v) school and classroom monitoring system for early identification of and intervention on girls at risk of drop out; and (vi) community-based mechanism for safe passage to school.

1.2 Promoting Girls' Completion of Secondary Education through Quality Alternative Education Pathways including:

- Setting up an ICT-enabled system for tracking girls dropping out at national and district level to provide key information for AEP planning and implementation.
- Alternative Education Centers and LGAs undertaking local outreach activities to out-of-school girls in the community. which will include activities such as AEP center-organized community meetings, information via local radio, flyers and brochures.
- Enhancing access to Alternative Education Pathways through (i) expansion of the network of AEP centers; and (ii) tuition fee subsidies for vulnerable girls.
- A quality package for strengthening student learning in Alternative Education Pathways will also be implemented

Component 2: Digitally-Enabled Effective Teaching and Learning

2.1 Effective Teaching and Learning

- Minimum package of critical teaching and learning resources for all schools: This package consists of an adequate number of textbooks and teacher guides in core subjects (English, Math and Sciences).
- Equitable, gender-balanced teacher deployment to schools
- In-service teacher training/continuous professional development (CPD) to improve classroom teaching practice for secondary English, Mathematics and Science teachers
- Evaluate student learning in lower secondary to provide opportunities for remedial use: to allow for targeted early intervention to prevent girl dropout due to learning difficulties

2.2 Digitally-enabled Teaching of Math Sciences and English:

- Development of an ICT in Education Strategy and plan for secondary education.
- Digital content and connectivity package to facilitate the teaching of English, Mathematics and Science in phases.

Component 3: Reducing Barriers to Girls' Education through Facilitating Access to Secondary Schools

- Expansion of the secondary school network to reduce the distance to secondary schools, especially in rural areas. SEQUIP will disburse project funding on the basis of the number of schools in each LGA meeting minimum infrastructure standards
- Support upgrading existing secondary schools with the minimum infrastructure package (number of classrooms/students, adequate WASH facilities, multi-purpose science labs, electricity, etc) with the objective is that at least 50 percent of all existing schools in all LGAs will meet the minimum standards set.

Component 4: Technical Assistance, Impact Evaluation and Project Coordination

This Vulnerable Group Planning Framework (VGPF) is based on relevant aspects of Tanzanian law and the World Bank's Environmental and Social Framework (ESF). Nine of the Environmental and Social Standards (ESSs) within the ESF apply to the Project. Environmental and Social Standard (ESS7) on Sub-Saharan African Historically Underserved Traditional Local Communities requires that projects enhance opportunities for Vulnerable Groups Communities to participate in, and benefit from the development process in ways that do not threaten their unique cultural identities and wellbeing. The Vulnerable Groups Planning Framework (VGPF) is a guide for fully

engaging Vulnerable Groups in the development and implementation of SEQUIP at the community level.

According to ESS7, within Tanzania Vulnerable Groups (VGs) include hunter-gatherer communities, pastoralist and agro-pastoralist communities, (namely the Hadzabe, Akie, Sandawe Maasai and Barbaig). These groups are mainly located in the North of Tanzania. In the context of SEQUIP, the VGs are likely to receive long term project benefits through:

- i. Student access to schools and retention through increase of the quantity, quality and presence of teachers in the classrooms leading to improved learning outcomes for students. In addition, Targeted advocacy, social support program, provision of guidance and counselling service for students will lead to motivation to attend school on regular basis and complete secondary education.
- ii. Improved transition to upper secondary school as a result of improved school environment for learning through construction of classrooms, science laboratories, sanitation and water facilities.
- iii. Better learning outcomes of Mathematics, English and science by VG students through provision of textbooks for mathematics, English and science subjects for secondary schools.
- iv. Targeted advocacy will lead to reduction of negative cultural practices among the VGs towards education.
- v. Reduction in early marriages and pregnancy through provision of guidance, counselling and life skills education to students.

The main impacts to vulnerable groups are presented in the table below along with the types of mitigation measures that will need to be implemented in order to minimise these potential risks and impacts. During the development of the VGP these measures will be discussed and agreed with the affected VG and if needed additional measures will be included to address specific impacts associated with any components of the Project.

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Mitigation Measures	Time frame	Responsible Person/ Institution
1.	Access to the schools/ Alternative Education Pathway (AEP) facilities	Inequitable access to the schools' /AEP facilities due to distance from their communities, especially if the school is located near to an existing (larger) village which is made up in full or part of people who are not from the vulnerable group.	<ul style="list-style-type: none"> • Review of LGA Plans related to schools to ensure they include consideration of VGs. • Provision of alternative opportunities such as placement in schools with boarding facilities. • Location of VGs should be considered during planning of location (districts) where sub-projects will be located as per the siting criteria in the ESMF. • Engagement with VGs over access to secondary education to meet their needs. 	Project Planning	Local Government Authority (LGA)
2.	Support to the project	Unacceptability and / or inadequate support of the project from the VGs if they are not involved fully from the inception. This includes consideration of the type of constructed schools e.g. boarding schools as well as input into elements such as the safe school's program.	<ul style="list-style-type: none"> • Encourage involvement of VG in planning, implementation and supervision of the project through stakeholder engagement. • Inclusion of VGs representatives in school construction committees where relevant. • Stakeholder engagement in relevant languages and in a 	On-going but focused effort during the preparation of sub- projects.	SEQUIP Coordination Team (SCT), LGAs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Mitigation Measures	Time frame	Responsible Person/ Institution
			manner that meets their cultural norms.		
3.	Access to natural resources	Conflict may arise over access to natural resources needed to construct and operate the schools in particular water sources and the location of quarries etc. For water, this is a particular risk in areas affected by drought and or climate change.	<ul style="list-style-type: none"> • Engagement over the use of identified natural resources. • Agreement on use/ shared use of such resources. • Consultation and agreement on the location of borrow pits, use and rehabilitation following project construction. • If needed identify alternative resources regardless of the distances and accessibility 	On-going but focused effort during the preparation of sub-projects.	LGAs School Construction Committee (SCC)
4.	In-migration	The presence of a secondary school may contribute to immigration leading to further conflict over land, access to natural resources and equitable access to benefits from schools.	<ul style="list-style-type: none"> • Village Council/LGA to consider risk when planning where to site a school. • Provide awareness to VG community • Enforcement of land act and regulation 	On-going but focused effort during the preparation of sub-projects.	LGAs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Mitigation Measures	Time frame	Responsible Person/ Institution
5.	Siting of Facilities	Encroachment onto traditional land or cultural sites of VGs resulting in Project delays, conflict etc	<ul style="list-style-type: none"> • Presence of VGs to be determined as part of the screening process. • Early engagements with VG to identify any existing challenges with location their preferences etc. to determine if the site is feasible. • Development of a VGP to address impacts associated with the presence of VGs, • Development and implementation of the free prior and informed consultation process to demonstrate if there is support for the project, or FPIC, where applicable 	Sub-Project Development	LGAs SCT
6.	Loss of culture and traditional practices	VGs may fear that, sending their children to secondary schools in which they have little or no involvement in and where there are children from other tribes may erode their culture and traditional practices.	<ul style="list-style-type: none"> • Provide culturally appropriate training and information in local languages on the importance of education by using their role models. 	Prior to undertaking any Project components in districts where VG are based. On-going	SCT, LGAs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Mitigation Measures	Time frame	Responsible Person/ Institution
7.	Increased risk of GBV/SEA	<ul style="list-style-type: none"> Impacts associated with the presence of an external male workforce during construction may result in increased risk of GBV/SEA, increased disease transmission etc. In addition, cultural norms in these groups may make reporting incidences of GBV/SEA as well as certain diseases more difficult. 	<ul style="list-style-type: none"> Provide culturally appropriate training and information in local languages and include in national campaigns conducted solely in Kiswahili. Ensure that GRM allow for confidential reporting by VGs and access to referral services. Code of Conduct for workers to avoid negative interactions. Training of workers on the code of conduct. 	<p>Prior to undertaking any Project components in districts where VG are based.</p> <p>On-going</p>	LGAs
8.	Non-inclusion of women's and children's needs due to lack of consultation during discussion of social and developmental issues	<ul style="list-style-type: none"> Inadequate participation of women in decision-making processes and therefore low acceptance of schools 	<ul style="list-style-type: none"> LGAs and community leaders should ensure equal participation of women during consultation and in decision-making this may require specific focus group discussions with women from VGs with facilitators they are comfortable talking with in local languages. Continuous awareness-raising of women's rights to land, natural resources and livelihoods. 	<p>Prior to undertaking any Project components in districts where VG are based.</p> <p>On-going</p>	LGAs, Village Councils, NGOs, CBOs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Mitigation Measures	Time frame	Responsible Person/ Institution
9.	Increased vulnerability of VGs due to communication barriers	Exclusion of VGs from the Project resulting in lack of access to benefits and potentially greater levels of impacts compared to other communities.	<ul style="list-style-type: none"> • Use of communication mechanisms that will assure their participation in the project including specific meetings with VGs, NGOs representing their rights etc. • Use of local leaders from their groups for effective communication • Development and implementation of a Vulnerable Groups Plan where relevant for each sub-project. • Appropriate communication framework for a sub-project to ensure VGs voices are heard, pending issues resolved and grievances heard. • Use of local languages in meetings with VGs via translators if needed. • Access to information in local languages not just Kiswahili where relevant. 	<p>Prior to undertaking any Project components in districts where VG are based.</p> <p>On-going</p>	SEQUIP, VCs, CMCs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Measures	Mitigation	Time frame	Responsible Person/ Institution
			<ul style="list-style-type: none"> Ensuring that VG community leaders are involved in all discussions especially where these groups have no or limited involvement in Village Councils. 			

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Vulnerable Group Plans (VGPs) will be prepared prior to implementing any components in the districts in which they are based through a highly participatory, flexible and pragmatic process using a participatory planning approach. The implementation of the VGPF in the Project will help Vulnerable Groups to create opportunities for improving their quality of life and wellbeing. All the VGPs that will be prepared under the Project will include the following contents, as needed:

1. A summary of the legal and institutional framework applicable to VGs.
2. Baseline information on the demographic, social, cultural, and political characteristics of the affected VGs communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.
3. A summary of the social assessment which will provide an analysis of the socio-economic, environmental and cultural context for VGs.
4. A summary of results of the stakeholder consultation with the affected VGs that was carried out during project preparation.
5. A framework for ensuring free, prior, and informed consultation with the affected VGs before during sub-project preparation and implementation and any proof of the same once achieved.
6. An action plan of measures to ensure that the VGs receive social and economic benefits that are culturally appropriate, including, if necessary, measures to enhance the capacity of the project implementing agencies.
7. When potential adverse effects on VGs are identified, appropriate action plans of measures to avoid, minimize, mitigate, or compensate for these adverse effects drawing on the information presented in the ESMF and VGPF.
8. The cost estimates and financing plan for the VGP; each project will bear full cost of assisting and rehabilitating VGs.
9. Accessible procedures appropriate to the project to address grievances by the affected VGs arising from project implementation. When designing the grievance procedures, the government takes into account the availability of judicial recourse and customary dispute settlement mechanisms among the VGs'.
10. Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the VGP. The monitoring and evaluation mechanisms should include arrangements for the free, prior, and informed consultation with the affected VGs'.

The Ministry of Education, Science and Technology (MoEST) will establish a monitoring system involving the Presidents' Office, Regional Administration and Local Government (PO RALG) who is the implementing agency to ensure development and effective implementation of VGPs at the district and community level. The Grievance Redress Mechanism provides a formal channel for community members to air grievances and to improve performance and provide a high level of accountability.

The implementation of VGPs at the community level will depend on the number of Vulnerable Groups, their location and the nature and scale of any impacts associated with the components of the Project.

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CHAPTER ONE

INTRODUCTION

1.1 Country Context

The World Bank has been successfully supporting the basic education sector in Tanzania for 30 years. It has been supporting quality improvements in primary and lower secondary education through the Education Program for Results (EPforR) of US\$ 122 million (Credit No. TZ-55270) with Additional Financing of US\$ 80 million until 2020. In addition to the ongoing EPforR operation, the World Bank had a stand-alone secondary education project that closed in December 2016. The project improved the quality of secondary education and was successful at improving completion rates and quality standards of secondary schools.

The Proposed Secondary Quality Improvement Project (SEQUIP) will support Tanzania's second Five-Year Development Plan (FYDP II) – Nurturing Industrialization for Economic Transformation and Human Development and the Education Sector Development Plan (ESDP 2016/17-2020/2021). The FYDP II emphasizes education and capability development and includes key interventions and indicators for secondary education, notably: (i) improving the teaching and learning environment, including pupil-qualified teacher ratios, and (ii) expanding use of ICT in teaching and learning. In addition, the project's focus on digital skills, mathematics and science in secondary education which will help provide a greater pool of highly skilled tertiary and higher education levels' entrants, which is currently inadequate.

Since the implementation of Fee Free Basic Education Policy (FFBEP)¹ in the year 2016, the enrollment in secondary education has increased. Despite of significant growth in the overall school-age population, gross enrollment rates in secondary have risen from 12 to 28 percent between 2016 and 2018. Inequalities in access to secondary education have also narrowed. Overall, the number of graduates entering the labor force with either lower or upper secondary education has increased by 150,000 to 420,000 between 2009 to 2018 adding to the existing stock of skilled workers.

1.2 Relationship to Country Partnership Framework

SEQUIP will directly contribute to three pillars of the World Bank Group's Country Partnership Framework (CPF) 2018-2022. The main pillars are: (i) diversify growth and

¹ The FFBEP abolished non-voluntary parental contributions to primary schools and tuition fees in government lower secondary schools.

enhanced productivity; (ii) boost human capital and social inclusion; and (iii) make institutions efficient and accountable. SEQUIP will contribute to improving access to and raising girls' and boys' learning outcomes in secondary education, which will promote human capital and inclusion. It will serve as the basis for further skills development and on-the-job training as critical elements for enhanced productivity. Lastly, the project's support to quality assurance and monitoring and evaluation systems will enhance transparency of responsibilities and make public institutions more efficient and accountable.

The project will contribute to the ESDP priorities in secondary education and the implementation of the Government's Fee Free Basic Education Policy, notably (i) expanding equitable access and enhancing student retention in school, and (ii) creating a supportive teaching and learning environment, including expansion of ICT for teaching and learning, and improving student achievement.

1.3 Environmental and Social Framework

The Project will use the new Environmental and Social Framework (ESF) applying the 9 relevant standards out of the 10 Environmental and Social Standards (ESSs). The Environmental and Social Standards (ESS's) that apply to Project include: Assessment and Management of Environmental and Social Risks and Impacts (ESS1); Labor and Working Conditions (ESS2); Resource Efficiency and Pollution Prevention and Management (ESS3); Community Health and Safety (ESS4); Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5); Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6); Indigenous Peoples/Sub Saharan African Historically Underserved Traditional Local Communities (ESS7); Cultural Heritage (ESS8), and Stakeholder Engagement and Information Disclosure (ESS10). Financial Intermediaries (ESS9) is not relevant to this Project. This VGPF is prepared to address the requirements of ESS7.

1.4 Justification for a VGPF

A Vulnerable Groups Planning Framework (VGPF) is developed when a proposed project design is not yet finalized and it is impossible to identify all of the impacts, as is required to prepare a Vulnerable Groups Plan (VGP). This situation applies to SEQUIP as at the time of preparation of this VGPF, (a) sub-project sites (locations of schools) have not yet been identified even at a regional level; (b) the locations where other components will be piloted have not yet been determined and (b) vulnerable groups whose rights and

livelihoods may be affected by the SEQUIP Components have not yet been defined or engaged with.

During project preparation, it has been identified that project investments or components under SEQUIP will be undertaken in areas where vulnerable groups are present or have collective attachment to land in the project area. To qualify for funding from the Bank and following best practice documented in the World Bank's Environmental and Social Standards notably ESS7 (Sub-Saharan African Historically Underserved Traditional Local Communities) and ESS10 (Stakeholder Engagement and Information Disclosure), a Vulnerable Groups Planning Framework (VGPF) has been prepared to ensure that the development process fully respects the dignity, human rights, economies, and culture of vulnerable groups and that the SEQUIP sub-projects have community support or consent from the affected vulnerable groups, where relevant.

For projects where vulnerable groups (VGs) are likely to be present in, or have collective attachment to the project area, but their presence or collective attachment cannot be determined until the sub-projects or investments are identified, the borrower (in this case the GoT through the MoEST) prepares a Vulnerable Groups Planning Framework (VGPF). The VGPF provides for the screening² and review of the proposed projects in a manner consistent with ESS7. SEQUIP will integrate the VGPF requirements into the project design of sub-projects where vulnerable groups are present. A key focus of the VGPF and the subsequent VGPs will be to propose an action plan for such groups to benefit from the project.

The VGPF outlines the processes and principles of screening to determine if a proposed activity has impacts – positive or negative - on vulnerable communities. This VGPF sets out the procedures and processes for the preparation of a VGP, including the social screening and assessment process; development of mitigation measures; requirements for Free, Prior and Informed Consent (FPIC); stakeholder engagement and disclosure procedures; and a Grievance Redress Mechanism (GRM). A detailed VGP will be prepared before implementing Project components and screening conducted to determine the presence of Vulnerable Groups (VGs) or attachment to the Project area.

The VGP for projects will be prepared through a participatory, flexible and pragmatic process using participatory planning based on the findings of stakeholder engagement conducted. The Local Government Authorities (LGAs) facilitators, in consultation with VGs in their respective areas, will develop specific VGPs appropriate to the potential

² The project is screening for a range of potential environmental and social risks including the likely presence of vulnerable groups to determine the instruments that need to be prepared. This is separate to the WB process for screening of VGs.

impacts including respective mitigation measures as well as ensuring they receive project benefits.

1.5 Methodology and Consultation

The process followed in the preparation of this VGPF consisted of:

- i) Collection of baseline data on the VGs in Tanzania including lifestyle, livelihood, history, etc;
- ii) Identification of potential positive and negative impacts of the proposed project on the VGs;
- iii) Approach for developing mitigation to address impacts identified and ensuring access to benefits;
- iv) To inform development of subsequent VGPs; and
- v) Formulation of monitoring and evaluation plan.

The process involved two key activities – detailed literature review and consultations with the VGs as described below.

1.5.1 Literature Review

A review was undertaken of existing baseline information and literature to gain an understanding of the VGs. Among the documents that were reviewed in order to familiarize and understand VGs in relation to the project were:

- World Bank's ESS7 -Sub-Saharan African Historically Underserved Traditional Local Communities;
- SEQUIP Project Concept Note (PCN); and
- The Constitution of the United Republic Tanzania.

1.5.2 Public Consultations

Public consultation with key stakeholders to disclose and deliberate on the draft VGPF will be done prior to project appraisal. The objectives of the consultation are to disclose information on SEQUIP and disclose the draft VGPF to representatives of various VGs present in Tanzania. The consultations will take place in one region, namely Manyara, out of three regions with VGs. The consultations will also provide an opportunity to the VGs and their representatives to voice their opinions and concerns on different aspects of the project and the VGPF. The consultation will take into consideration the representation of participants from different groups within the VGs such as women and men, youth, elders, community-based organizations and village leaders. The consultation

method will involve one or combination of: workshop / meetings, focus group discussion and interviews depending on the nature of participants in order to correct relevant information in a free manner from different participants of VGs. The information gathered from the consultation meetings will be used as inputs to improve the VGPF. CSOs who focus on issues related to VGs will also be invited to participate in the meeting and submit comments on the plans.

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CHAPTER TWO

DESCRIPTION OF THE PROJECT AND COMPONENTS

2.1 Project Background

The Government of the United Republic of Tanzania through the Ministry of Education, Science and Technology (MoEST) and President Office Regional Administration and Local (PO RALG) intends to implement SEQUIP which aims to increase access to secondary education, provide responsive learning environments for girls and improve completion of quality secondary education for girls and boys.

The Program will support both Second Five-Year Development Plan (FYDP II) and the Education Sector Development Plan (ESDP). The FYDP II emphasizes education and capability development and includes key interventions and indicators for secondary education, notably:

- i. improving the teaching and learning environment, including pupil-qualified teacher ratios; and
- ii. expanding use of ICT in teaching and learning. In addition, the project's focus on digital skills, math and science in secondary education will help provide a greater pool of highly skilled technical college and university level entrants, which is currently small.

The Project will use the new Environmental and Social Framework (ESF) applying the 9 relevant standards out of the 10 Environmental and Social Standards (ESSs). The Environmental and Social Standards (ESS's) that apply to Project include:

- Assessment and Management of Environmental and Social Risks and Impacts (ESS1);
- Labor and Working Conditions (ESS2);
- Resource Efficiency and Pollution Prevention and Management (ESS3);
- Community Health and Safety (ESS4);
- Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5);
- Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6);
- Indigenous Peoples/Sub Saharan African Historically Underserved Traditional Local Communities (ESS7);
- Cultural Heritage (ESS8), and
- Stakeholder Engagement and Information Disclosure (ESS10).

The Standard on Financial Intermediaries (ESS9) is not relevant to this Project.

2.2 Project Description

The Project Development Objectives (PDOs) are to increase access to secondary education, provide responsive learning environments for girls and improve completion of quality secondary education for girls and boys.

The project will adopt a three-pronged approach to promoting girls' secondary education:

- i. Ensuring a safe, supportive learning environment to keep girls in school longer and delay early marriage and pregnancy; and strengthening their support by families and communities;
- ii. Expanding effective and clear Alternative Education Pathways (AEP) to enable girls who drop out of lower secondary school, especially young mothers, to finish the lower education cycle and enter upper secondary school; and
- iii. Improving access to and completion of quality secondary education for girls and boys.

The project will contribute to increasing the total number of students in secondary education including AEP by 250,000. It will directly benefit about 2 million secondary school students, including 920,000 girls, 95% of whom are enrolled in lower secondary. SEQUIP will help more girls transition from lower to upper secondary education, as girls are underrepresented at this level. It will also support girls who had to leave lower secondary public schools due to pregnancy or other reasons to continue with their secondary education through Alternative Education Pathways (AEP) and allow them to re-enter upper secondary public school.

2.3 Project Components

Activities under SEQUIP will be structured into four main components:

1. Component 1: Empowering Girls Through Secondary Education and Life Skills
2. Component 2: Digitally-Enabled Effective Teaching and Learning
3. Component 3: Reducing Barriers to Girls' Education through Facilitating Access to Secondary Schools; and
4. Component 4: Technical Assistance, Impact Evaluation and Project Coordination

The detailed description of each component is presented in Table 2-1 below.

Table 2-1: Overview of Project Components

Component	Key Activities
Component 1: Empowering Girls through Secondary Education and Life Skills	
Sub-component 1.1: Creating Safe Schools	<p>Commitment to Safe School Program implemented in 2,000 schools, with the objective to induce behaviour change at the school level. The Safe School Program includes:</p> <ul style="list-style-type: none"> • Trained school guidance and counseling teachers;³ • Students’ life skills training through girls’ and boys’ clubs by the guidance and counselling teachers; • In-service training of secondary school teachers on the teacher code of conduct and gender sensitive pedagogical approaches; • Training of school heads and School Boards on GBV, safe school issues etc.; • School and classroom monitoring system for early identification of and intervention on girls at risk of drop out; and • Community-based mechanism for safe passage to school. <p>The Safe School program will be implemented in two phases: A first phase would take place in 700 schools by year 3 to ensure smooth implementation and allow for adjustments before scale up to an additional 1,300 schools by year 5 and to a total of 2,000 secondary schools in the second phase,</p>

³ Each school will have two guidance and counselling teachers, one for girls and one for boys, with the exception of All girls or all boys schools will only have one guidance and counseling teacher.

<p>Sub-component 1.2: Promoting Girls' Completion of Secondary Education through Quality Alternative Education Pathways</p>	<p>Strengthening the system for monitoring and outreach to secondary school girl drop-outs: Set up an ICT-enabled system for tracking girls dropping out at national and district level to provide key information for AEP planning and implementation (e.g. on where new AEP centers might need to be opened), but more importantly, enable outreach activities to these girls and their families to encourage them to continue their education and inform them of available education options.</p> <p>Developing and implementing an innovative, local grassroots outreach program: Alternative Education Centers will undertake local outreach activities to out-of-school girls in the community. AEP centers will be financially incentivized to undertake awareness raising and outreach activities. The outreach program will be led by secondary school, existing community outreach mechanisms, and AEP graduate girls from the local community. Activities such as AEP center-organized community meetings, information via local radio, flyers and brochures will be undertaken. Capacity building for AEP center coordinators for effective outreach activities will be included in their in-service training.</p> <p>Enhancing access to Alternative Education Pathways through (i) expansion of the network of AEP centers; and (ii) tuition fee subsidies for vulnerable girls: The program will be based on flexible, self-paced learning arrangements and follow a blended approach, which will include a combination of center-based learning and self-learning at times of day convenient to young mothers/out of school girls.</p> <p>A quality package for strengthening student learning in Alternative Education Pathways will also be implemented to strengthen AEP center quality. monitoring and ensure it is similar to schools. In addition to strong academic content, AEP centers will provide the necessary ancillary life skills and reproductive health education to empower girls to successfully complete their secondary education.</p>
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Component 2: Digitally Enabled Effective Teaching and Learning	
<p>Sub-component 2.1 Effective Teaching and Learning Resources</p>	<p>Minimum package of critical teaching and learning resources for all schools: This package consists of an adequate number of textbooks and teacher guides in core subjects (English, Math and Sciences).</p> <p>Equitable, gender-balanced teacher deployment to schools will include the development of the following: (i) Teacher Deployment Strategy for secondary schools focused on alleviating the math and science teacher needs and a gender-balanced deployment across schools. (ii) Multi-year Financial Simulation Teacher Model to forecast and plan teacher needs. (iii) Software for secondary teacher deployment.</p> <p>In-service teacher training/continuous professional development (CPD) to improve classroom teaching practice for secondary English, Mathematics and Science teachers on subject content knowledge, pedagogical and gender-sensitive approaches, including identification of at-risk students and remedial measures. In phase 1 about 700 select secondary schools will be established as Teacher In-service Training Centres (TITCs). The rollout of the CPD program will be evaluated to assess its effectiveness and impact on student learning outcomes.</p> <p>Evaluate student learning in lower secondary to provide opportunities for remedial use: to allow for targeted early intervention to prevent girl dropout due to learning difficulties.</p>
<p>Sub-component 2.2 Digitally-enabled Teaching of Math, Sciences and English</p>	<p>Development of an ICT in Education Strategy and plan for secondary education. This includes a mapping/baseline assessment of active and past ICT initiatives in secondary education, as well as an accompanying analysis of international best practices. During implementation special needs teachers and students may also benefit from the ICT based teaching program.</p>

	<p>Digital content and connectivity package: The innovative digital education package will facilitate the teaching of English, Mathematics and Science in a first phase of 700 schools.</p>
<p>Component 3: Reducing Barriers to Girls' Education through Facilitating Access to Secondary Schools</p>	
	<p>Expansion of the secondary school network to substantially reduce the distance to secondary schools by an expansion of the secondary school network, especially in rural areas. SEQUIP will disburse project funding on the basis of the number of schools in each LGA meeting minimum infrastructure standards. The new school construction program will consist of a minimum infrastructure package based on the school construction and maintenance strategy (e.g. number of classrooms/students, adequate WASH facilities, especially important for girls; multi-purpose science labs, electricity, etc.).</p> <p>Minimum infrastructure package for existing schools: SEQUIP will support upgrading existing secondary schools with the minimum infrastructure package, with the objective is that at least 50 percent of all existing schools in all LGAs will meet the minimum standards set. A School Infrastructure Needs Assessment will be carried out in all LGAs to assess the current situation and establish the infrastructure gap at the LGA level. The approach used for construction is the current community-based construction approach. One criterium of site selection for new schools will be water/water connection availability.</p> <p>All school construction activities will be coordinated closely with other ongoing and pipeline WB Projects and government initiatives as much as possible to ensure <i>electricity connections</i> for schools in coordination with the Rural Electrification Expansion Program; <i>internet connectivity</i> by potentially linking up with the Digital Tanzania Project during implementation and <i>Water, Sanitation and Hygiene facilities</i> and their maintenance and use at schools (water connection for schools are part of the utility service provision, this will</p>

	<p>include construction of a borehole and provision of a hand or electric pump) by coordinating with the Sustainable Rural Water Supply and Sanitation Program.</p> <p>Component 3 will be implemented by school construction committees and school boards, with the construction largely overseen, monitored and tracked by PO-RALG. MoEST will be key in ensuring the request for a new school is registered and temporarily accredited to enable construction.</p>
<p>Component 4: Project Coordination and Impact Evaluation will focus on:</p> <ul style="list-style-type: none"> • Project coordination, M&E (including impact evaluation to inform further implementation), supporting achievements of sub-components Strengthening environmental and social safeguards implementation and Grievance Redress Mechanism • Annual Verification of DLIs 	

2.4 Overall Project Implementation Arrangement

SEQUIP will be implemented by the Ministry of Education, Science and Technology (MoEST) and the President's Office, Regional Administration and Local Government (PO-RALG), based on the well-functioning structure in place under the ongoing EPforR. MoEST will be responsible for overall monitoring and evaluation of implementation, setting of standards and strategies. PO-RALG, through the Regional Secretariats and LGAs, will be responsible for day-to-day implementation of the Project. Overall, strategic oversight of SEQUIP will be under the responsibility of the SEQUIP Senior Management Team (SSMT), co-chaired by the Permanent Secretaries of MoEST and PO-RALG.

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CHAPTER THREE

IDENTIFICATION OF VULNERABLE GROUPS

3.1 General Characteristics of Vulnerable Groups

Vulnerable Groups have the following characteristics as defined in ESS7:

- i. Self-identification as members of a distinct social and cultural group and recognition of this identity by others; and
- ii. Collective attachment to geographically distinct habitats, ancestral territories or areas of seasonal use or occupation, as well as to the natural resources in those areas; and
- iii. Customary cultural, economic or social or political institutions that are distinct or separate from those of the mainstream society or culture; and
- iv. A distinct language or dialect, which is often different from the official language of the country or region in which they reside.

3.2 Vulnerable People in Tanzania

The following VGs are present in Tanzania (See Figure 3-1):

- The Hadzabe live around Lake Eyasi and are mainly found in Mkalama, Karatu, Mbulu and Meatu Districts.
- The Akie, also called Ndorobo are found in Kiteto District in Manyara region.
- The Sandawe people live at Chemba and Kondoa in Dodoma region.
- The Maasai are found mainly at Karatu, Ngorongoro, Simanjiro, Monduli districts and parts of Manyara region.
- The Barbaig, also known as Datoga, occupy the northern volcanic highlands near Mount Hanang and around the Rift Valley, and are mainly found in Hanang, Babati and Karatu Districts.

The Hadzabe: are a hunter-gatherer population consisting of approximately 1000-1500 individuals who live near Lake Eyasi. They speak Hadzane a click language. As hunter gathers the Hadza move within and between traditional areas near Lake Eyasi although they have also utilized land in Yaeda Vally, Mount Oldeani and the Serengeti Plains. The Hadza usually live in camps of 20-40 people who will decide where to undertake hunting and gathering based on their knowledge of the land. These camps may break up and reform (with different members) depending on the needs of the people, to resolve conflict or due to illness. The Hadza are broadly egalitarian and therefore do not have a determined hierarchy. While men and elders may receive more respect women are equal.

Within the Hadza men hunt small animals within their areas, women collect herbs and fruits from the forest, including honey from traditional bee hives to feed their families. Women are also responsible for taking care of the family and building the homes (which belong to them). The most important wild foods in the Hadza diet are large and small game, baobab, berries, several types of wild honey, and tubers. The Hadzabe, traditionally owned land communally. However, this is changing and some currently own land pieces individually.



Figure 3-1: Location of VGs in Tanzania

The Akie: are a hunter-gatherer population consisting of approximately 5000 individuals who live in the Arusha Region. They speak the Akie language. Traditionally the Akie foraged over large areas with their family groups occasionally establishing semi-permanent villages. However, competition for land (both with the Maasai, agriculturalists and hunting concessions) has reduced the amount of land and water available to them resulting in the community becoming more settled. Many Akie now live in more established villages from which will head into the bush for several days or weeks, hunting and gathering honey. As they have become more settled many Akie now also grow maize however harvests are often small affecting food security. The Akie also trade in honey and dairy products. The Akie have customarily considered their lands communal. However, some individuals and groups are now seeking land titles to protect their rights to traditional lands.

The Sandawe: were traditionally hunter gatherers and consist of approximately 40,000 people who speak the tonal Sandawe language. The Sandawe live in isolated scattered homesteads in Dodoma Region. They adopted agriculture practices from their neighbours and grow their staple crops of millet, sorghum and increasingly, maize. Women stay at home taking care of children and cultivating crops while men go for hunting and tend to any animals kept. The Sandawe also have a tradition of mutual cooperation in such things as hoeing and building temporary huts and organising informal parties to hunt. Households, each comprising a nuclear family, are organized into patrilineal exogamous clans that form the basis for autonomous local communities. The Sandawe were forced to settle at the time of the "villagization" policy in Tanzania, at the village of Farkwa and to engage in agriculture, as were the neighboring peoples.

The Barbaig: are traditionally pastoralists near Mount Hanang consisting of approximately 35000-50000 people and are the largest group amongst the Datoga people. They are organised into familial clans with a common ancestor. Each clan has a clan head who convenes the clan's affairs through a clan council. Social order is maintained through a series of councils or jural moots that have different authorities dealing with community-wide issues, clan matters, neighbourhood issues, and offences by men against women. Serious offences are dealt with by selected senior elders. The Barbaig traditionally lived by hunting and animal husbandry including goats and sheep but cattle for milk production are central to the lives of the Barbaig. Animals are kept as assets to absorb shocks in case of natural calamities and emerging uncertainties. Climatic changes resulting in drought and competition for their traditional lands have resulted in insufficient pasture and water for livestock. This has forced them to start practicing

agriculture by engaging in subsistence farming during the rainy season. The Barbaig grow crops including maize, sorghum, beans and increasingly sunflowers. Traditionally men usually take care of their animals and women take care of children. In the Barbaig (Datoga) land for homesteads is held under customary private ownership; land is inherited by the father (owners) sons. The result of this inheritance pattern (and a continued growth in population) is that increasingly, smaller farms are being inherited. However, most pasture land and natural resources are considered to be under customary communal ownership.

The Maasai: are pastoralists, hunters and warriors using spears, shields and clubs. There are estimated to be 430,000 Maasai in Tanzania. Maasai society is patriarchal with elder males making most of the decisions for the group. The Maasai practice polygamy with each wife having her own house. Boys are expected to shepherd the family's cattle (which provides their main food sources: meat, milk and blood). Girls help their mothers gather firewood, cook and handle most of the family's other domestic responsibilities. Traditionally, the Maasai practiced pastoralism across Northern Tanzania including on land that now forms part of the Serengeti National Park and Ngorongoro Conservation Area. As a result of pressure on land associated with increased population, decreases in herd size, competing land uses (with other tribes, national parks and agricultural development, the Maasai are increasingly growing crops (notably maize) as well as moving to other areas in search of pasture. Maasai people are also increasing taking up formal and waged employment. Among the Maasai, land is a collective asset that defines identity by distinguishing the extent of ethnic territory from others and supports livelihood. It is not transferable nor is it for speculative investment. Land use originally was universally for pastoralism, that is, the raising and keeping of livestock. This has also changed over the years.

3.3 Challenges Facing Vulnerable Groups

Despite their distinct ways of life and differences, these communities share some common challenges in terms of maintaining their traditional ways of life, access to land and as a result of changes associated with climate change. Such issues include:

- i. Hunting and gathering and pastoralism as a means of livelihood has been diminishing due to harsh climatic conditions which has resulted in the decline of wild animals for hunting, depletion of natural resources including agricultural land and water. This has resulted in an increase in subsistence farming although this is often characterized by low yield and unreliable rainfall.

- ii. Government laws prohibit hunting without a license and restrict hunting (and grazing) in national parks which restrict the possibility of hunting as the cost of the licenses is prohibitively expensive for these groups.
- iii. Their land is being highly encroached by other ethnic groups. As a result, VGs face scarcity of land for practicing their traditional activities, pastoralists or as hunter-gatherers, something which contributes to a shift in their economic activities to small-scale farming or casual labour to survive.
- iv. Hunter-gatherers have tended to be more isolated from communities and decision making. This is due in part to their nomadic lifestyle.

In order to address encroachment of land on which VGs depend, the Village Councils have been mandated to establish a land register at the village level to enable people to get customary land ownership. The initiative also facilitates women to possess land legally and plays a role in solving land conflicts in the respective areas.

Generally, the availability of social services is minimal in the areas where these communities reside. They usually stay in the peripheral areas and as a result, even if the facilities are available, they need to travel long distance to access those services. Given the nature of villages in VGs area, children have to walk long distances to school, which emphasizes the need for additional schools in their sub villages. Boarding schools may also help VGs children gain access to education since their parents are moving from one place to another.

Most of the VGs are located in remote areas and they inhabit where accessibility (road) is difficult and infrastructures are limited. Most of their villages have only primary schools which have inadequate infrastructure coupled with limited access to secondary schools. Information from the LGAs indicate that majority of students including VGs drop out of schools because they cannot afford to continue their studies due to:

- i. Long distance to the nearest secondary school to their village;
- ii. Poverty;
- iii. Early marriage for girls;
- iv. Early pregnancy for girls;
- v. Lack of role models/ mentors; and
- vi. Lack of awareness by parents over their children's education.

CHAPTER FOUR

KEY ISSUES AND POTENTIAL IMPACTS OF THE PROJECT ON VULNERABLE GROUPS

4.1 Potential Beneficial Impacts

In the context of SEQUIP, the VGs in the project areas are likely to receive long term project benefits through:

- i. Student access to schools and retention through increase of the quantity, quality and presence of teachers in the classrooms leading to improved learning outcomes for students. In addition, Targeted advocacy, social support program, provision of guidance and counseling services for students will lead to motivation to attend school on regular basis and complete secondary education.
- ii. Improved transition to upper secondary school as a result of improved school environment for learning through construction of classrooms, science laboratories, sanitation and water facilities.
- iii. Better learning outcomes of mathematics, English and science by VG students through provision of textbooks for mathematics, English and science subjects for secondary schools.
- iv. Targeted advocacy will lead to reduction of negative cultural practices among the VGs towards education.
- v. Reduction in early marriages and pregnancy through provision of guidance, counseling and life skill education to students.

4.2 Potential Adverse Impacts

The main risks are that of exclusion of the VGs. Social risks predicted in the implementation process are as follows. The proposed mitigation measures are analysed in Table 4-1. It should be noted that these measures are indicative and as part of the VGP specific measures will be developed in consultation with affected people.

- i. Inequitable access to school due to distance from their communities, especially if the school is located near to an existing (larger) village which is made up in full or part of people who are not from the vulnerable group.
- ii. Unacceptability and / or inadequate support of the project from the VGs if they are not involved fully from the inception. This includes consideration of the type of schools that are being constructed e.g. boarding schools, input into location of the school and roles on the school board. Once operational, the exclusion of VGs in the implementation and management of the project at all levels (assuming them

to be recipients) will limit the chance of sustainability and may contribute to drop out rates and exclusion.

- iii. Inappropriate siting of facilities during site selection may result in encroachment on to VGs traditional lands resulting in land conflicts and disputes. In addition, it may also impact on cultural sites which are of importance to VGs but which are not known to other groups including local Village Councils. This may result in projects being abandoned, alternative sites needing to be identified and significant delays in implementing the projects.
- iv. Conflict may arise over access to natural resources needed to construct and operate the schools in particular water sources and the location of quarries etc. For water this is a particular risk in areas affected by drought and or climate change.
- v. The presence of a secondary school may contribute to immigration leading to further conflict over land, access to natural resources and equitable access to benefits from schools.
- vi. VGs may fear that, sending their children to secondary schools in which they have little or no involvement in and where there are children from other tribes may erode their culture and traditional practices.
- vii. Impacts associated with the presence of an external male workforce during construction may result in increased risk of GBV/SEA, increased disease transmission etc especially if the VGs do not receive culturally appropriate training and information in local languages and/ or are excluded from national campaigns that are run solely in Kiswahili. In addition, cultural norms in these groups may make reporting incidences of GBV/SEA as well as certain diseases more difficult.
- viii. Exclusion of women's and children's needs due to lack of consultation during discussion of social and developmental issues.

- ix. Increased vulnerability of VGs due to communication barriers.

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Table 4-1: Mitigation of Potential Adverse Impacts to VGs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Measures	Mitigation	Time frame	Responsible Person/ Institution
1.	Access to the schools/ Alternative Education Pathway (AEP) facilities	Inequitable access to the schools' /AEP facilities due to distance from their communities, especially if the school is located near to an existing (larger) village which is made up in full or part of people who are not from the vulnerable group.	<ul style="list-style-type: none"> • Review of LGA Plans related to schools to ensure they include consideration of VGs to ensure equitable access to benefits. • Provision of alternative opportunities such as placement in schools with boarding facilities. • Location of VGs should be considered during planning of location (districts) where sub-projects will be located as per the siting criteria in the ESMF. • Engagement with VGs over access to secondary education to meet their needs. 		Project Planning	Local Government Authority (LGA)
2.	Support to the project	Unacceptability and / or inadequate support of the project from the VGs if they are not involved fully from the inception. This includes consideration of the type of constructed schools e.g. boarding schools as well as input	<ul style="list-style-type: none"> • Encourage involvement of VG in planning, implementation and supervision of the project through stakeholder engagement. • Inclusion of VGs representatives in school construction committees where relevant. 		On-going but focused effort during the preparation of sub- projects.	SEQUIP Coordination Team (SCT), LGAs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Measures	Mitigation	Time frame	Responsible Person/ Institution
		into elements such as the safe school's program.	<ul style="list-style-type: none"> Stakeholder engagement in relevant languages and in a manner that meets their cultural norms. 			
3.	Access to natural resources	Conflict may arise over access to natural resources needed to construct and operate the schools in particular water sources and the location of quarries etc. For water, this is a particular risk in areas affected by drought and or climate change.	<ul style="list-style-type: none"> Engagement over the use of identified natural resources. Agreement on use/ shared use of such resources. Consultation and agreement on the location of borrow pits, use and rehabilitation following project construction. If needed identify alternative resources regardless of the distances and accessibility 		On-going but focused effort during the preparation of sub-projects.	LGAs School Construction Committee (SCC)
4.	In-migration	The presence of a secondary school may contribute to immigration leading to further conflict over land, access to natural resources and equitable access to benefits from schools.	<ul style="list-style-type: none"> Village Council/LGA to consider risk when planning where to site a school. Provide awareness to VG community Enforcement of land act and regulation 		On-going but focused effort during the preparation of sub-projects.	LGAs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Mitigation Measures	Time frame	Responsible Person/ Institution
5.	Siting of Facilities	Encroachment onto traditional land or cultural sites of VGs resulting in Project delays, conflict etc.	<ul style="list-style-type: none"> • Presence of VGs to be determined as part of the screening process. • Early engagements with VG to identify any existing challenges with location their preferences etc to determine if the site is feasible. • Development of a VGP to address impacts associated with the presence of VGs, • Development and implementation of the free prior and informed consultation process to demonstrate if there is support for the project, or FPIC, where applicable 	Sub-Project Development	LGAs SCT
6.	Loss of culture and traditional practices	<ul style="list-style-type: none"> • VGs may fear that, sending their children to secondary schools in which they have little or no involvement in and where there are children from other tribes may erode their culture and traditional practices. 	<ul style="list-style-type: none"> • Provide culturally appropriate training and information in local languages on the importance of education by using their role models. 	Prior to undertaking any Project components in districts where VG are based. On-going	SCT, LGAs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Measures	Mitigation	Time frame	Responsible Person/ Institution
7.	Increased risk of GBV/SEA	<ul style="list-style-type: none"> Impacts associated with the presence of an external male workforce during construction may result in increased risk of GBV/SEA, increased disease transmission etc. In addition, cultural norms in these groups may make reporting incidences of GBV/SEA as well as certain diseases more difficult. 	<ul style="list-style-type: none"> Provide culturally appropriate training and information in local languages and include in national campaigns conducted solely in Kiswahili. Ensure that GRM allow for confidential reporting by VGs and access to referral services. Code of Conduct for workers to avoid negative interactions. Training of workers on the code of conduct. 		<p>Prior to undertaking any Project components in districts where VG are based. On-going</p>	LGAs
8.	Non-inclusion of women's and children's needs due to lack of consultation during discussion of social and developmental issues	<ul style="list-style-type: none"> Inadequate participation of women in decision-making processes and therefore low acceptance of schools 	<ul style="list-style-type: none"> LGAs and community leaders should ensure equal participation of women during consultation and in decision-making this may require specific focus group discussions with women from VGs with facilitators they are comfortable talking with in local languages. Continuous awareness-raising of women's rights to land, natural resources and livelihoods. 		<p>Prior to undertaking any Project components in districts where VG are based. On-going</p>	LGAs, Village Councils, NGOs, CBOs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Mitigation Measures	Time frame	Responsible Person/ Institution
9.	Increased vulnerability of VGs due to communication barriers	Exclusion of VGs from the Project resulting in lack of access to benefits and potentially greater levels of impacts compared to other communities.	<ul style="list-style-type: none"> • Use of communication mechanisms that will assure their participation in the project including specific meetings with VGs, NGOs representing their rights etc. • Use of local leaders from their groups for effective communication • Development and implementation of a Vulnerable Groups Plan where relevant for each sub-project. • Appropriate communication framework for a sub-project to ensure VGs voices are heard, pending issues resolved and grievances heard. • Use of local languages in meetings with VGs via translators if needed. • Access to information in local languages not just Kiswahili where relevant. 	Prior to undertaking any Project components in districts where VG are based. On-going	SEQUIP, VCs, CMCs

S/ N	Issues	Potential Adverse Impacts	Enhancement/ Measures	Mitigation	Time frame	Responsible Person/ Institution
			<ul style="list-style-type: none"> Ensuring that VG community leaders are involved in all discussions especially where these groups have no or limited involvement in Village Councils. 			

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CHAPTER FIVE VULNERABLE GROUPS PLAN

5.1 Screening for Presence of VGs

Screening will be a mandatory requirement prior to the implementation of Project Components. This will be done to determine whether VGs are present or have collective attachment to the project area. The screening will be carried out by Community Development Officers in LGAs with the assistance of SEQUIP Coordination Team (SCT) who are well versed in the social and cultural issues of the VGs in the project area. Such screening will need to be undertaken to the satisfaction of the Bank, prior to the implementation of activities. It is important during the screening phase of the project implementation to carefully identify who will be adversely affected by the selected projects as it may not impact the entire group or it may impact non-vulnerable groups living in their midst or parts of several different groups only some of which are vulnerable. Procedures for screening are presented in the ESMF.

According to the above stated definition and characteristics of VGs, five groups of VGs have been identified in this framework (Maasai, Sandawe, Hadzabe, Aki and Barbaig). Therefore, if the project will have influence in the location of these VGs, a Social Assessment (SA) analysis and Vulnerable Groups Plan (VGP) will be planned.

5.2 Social Assessment Process

Prior to the implementation of any activities in a district where screening has identified the presence of VGs a Social Assessment (SA) will be undertaken by team of experts (led by the Community Development Officers CDO) from the LGA to conclude that VGs are present in or have collective attachment to the project area. The team of experts for the project will carry out a SA to evaluate the project's potential positive and adverse effects on the VGs.

The scope and type of analysis required for the SA will correspond to the nature and scale of the proposed project's potential impacts on the Vulnerable Groups present in the project area. The SEQUIP Coordination Team (SCT) (led by the Social Management Project Expert (SMPE)) will prepare detailed Terms of Reference (ToR) for the SA study once it is determined that VGs are present. The ToR for the SA will be shared with World Bank for clearance.

The experts will gather relevant information from separate focus group discussions. Discussions will focus on sub-project positive and negative impacts; and recommendations for design of Project that are needed for the VGs to benefit from the project. The LGAs Officers and SCT SMPE will be responsible for reviewing the SA and providing the necessary recommendation on involvement of VGs and ways to ensure they benefit from the project.

The SA will use quantitative analysis for information on issues such as population structure, educational level and socioeconomic indicators. Qualitative information will also be gathered on ways of life, livelihoods etc. Participatory assessments will also be undertaken to gather the views of stakeholders. The process of gathering baseline information⁴ will be through a *participatory rural appraisal mapping exercise* involving the VGs in the proposed sub-project area or district.

Mapping the community resources where the project investments are targeted will determine the sphere of influence, how the vulnerable communities utilize said resources so as identify how the project can avoid impacts to these resources and enhance potential benefits. Regarding customary rights of VGs to use of common resources, the mapping will provide information on (i) location and size of the area and condition of resources, (ii) primary users, including those that belong to VGs that currently use or depend on these common resources, (iii) secondary users and the types of uses they make, (iv) the effects of these uses on the VGs, and (vi) mitigation measures of adverse impacts if any.

Based on the information collected, comparative analysis will be used to determine the natures and degrees of different benefits and impacts for the project by considering project alternatives in the sub-project area, which will be verified with the Vulnerable Groups.

5.3 Preparation of Vulnerable Groups Plan

Projects Specific Vulnerable Group Plans (VGPs) will be prepared when activities have been identified in areas where Vulnerable Groups are present or in which they have a collective attachment, as determined during the screening process. The VGP will be developed by the CDO of the LGA with the support of the SMPE and SCT.

⁴Baseline information on education, employment, demographic social, cultural, and political characteristics of the affected VGs, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.

The SA will give baseline data of the demographic, economic, social, cultural and political characteristics, land use as well as natural resources in the area of which the VGs depend on. Based on the findings of SA, a VGP will be developed to address:

- i. aspirations, needs, and preferred options of the affected vulnerable groups;
- ii. local social organization, beliefs, ancestral territory, and resource use patterns among the affected vulnerable groups;
- iii. potential positive and negative impacts on vulnerable groups;
- iv. measures to avoid or mitigate adverse impacts;
- v. the requirements for FPIC where relevant;
- vi. measures to ensure project benefits will accrue to vulnerable groups;
- vii. measures to strengthen the capacity of local authority and relevant government departments to address vulnerable groups' issues;
- viii. the possibility of involving local CBOs and NGOs with expertise;
- ix. specific requirements related to stakeholder engagement and the GRM for VGs.
- x. budget allocation; and
- xi. monitoring.

The Vulnerable Groups Plan (VGP) will provide guidance on social, economic, or cultural issues to be addressed during construction and implementation of the project. The VGP will be developed to reflect the social-cultural activities, geographical location and livelihood activities of the respective community as well as the impact of the sub-project. Specific elements of the VGP are described below.

5.4 Impact Identification

The assessment of project benefits and adverse impacts will be conducted based on free, prior, and informed consultation, with the affected Vulnerable Groups (VGs). The determination of potential adverse impacts will entail an analysis of the vulnerability of, and risks to, the affected VGs given their distinct circumstances and close ties to land and natural resources, as well as their lack of access to opportunities relative to other social groups in the communities or districts in which they live.

5.5 Determination of Mitigation Measures

This will involve identification and evaluation of mitigation measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, and to ensure that the VGs receive culturally appropriate benefits under the project in a participatory manner. Mitigation

measures may involve compensation as well and typical mitigation actions or compensations. The appropriateness of these measures will be agreed with VGs through the FGDs and stakeholder engagement prior to finalizing the plan.

5.6 Capacity Building

During the vulnerable Groups orientation and mobilization process, the interest, capacity and skills of the VGs and their institutions, CBOs and NGOs, including social screening, will be assessed. If required the VGF will propose the provision of training for the VGs in among others resource mapping, monitoring and evaluation.

The SMPE will provide training and guidance to the LGA staff on social assessment, implementation of the VGPF and VGP with special attention to developing their knowledge on VGPF background, history and areas of concern as well as their skills for community orientation, free, prior and informed consultative planning, Participatory Rural Appraisal (PRA) tools and techniques.

5.7 Bank Decision on Project Investments

In deciding whether to proceed with the project, the government will then ascertain, on the basis of the VGP and the outcomes of the process of free, prior, and informed consultation, whether the affected VGs' provide their broad support to the project or FPIC where applicable. Documentation of community support or consent will be provided by minutes prepared from all meetings held with the VGs or through other processes as agreed with the VGs and the World Bank. The minutes will be verified and authenticated by community representatives. Where there is such community support or consent, the government will prepare and submit to the Bank a detailed report that documents:

- i. The findings of the social assessment/analysis;
- ii. The Vulnerable Groups Plan;
- iii. The process of free, prior, and informed consultation with the affected VGs;
- iv. Recommendations for free, prior, and informed consent with and participation by VGs during project implementation, monitoring, and evaluation;
- v. Any formal agreements reached with VGs'; and
- vi. Measures, including project design modification, that may be required to expand access to or address adverse effects on the VGs' and to provide them with culturally appropriate project benefits.

The Bank reviews the process and the outcome of the consultation carried out by the government to satisfy itself that the affected VGs have provided their broad support to the project. The Bank will review and clear the documents before implementation of each stage of the project.

5.8 Contents of a Vulnerable Groups Plan

All the VGPs that will be prepared under the Project will include the following contents, as needed:

1. A summary of the legal and institutional framework applicable to VGs.
2. Baseline information on the demographic, social, cultural, and political characteristics of the affected VGs communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.
3. A summary of the social assessment.
4. A summary of results of the stakeholder consultation with the affected VGs that was carried out during project preparation.
5. A framework for ensuring free, prior, and informed consultation with the affected VGs before during sub-project preparation and implementation and any proof of the same once achieved.
6. An action plan of measures to ensure that the VGs receive social and economic benefits that are culturally appropriate, including, if necessary, measures to enhance the capacity of the project implementing agencies.
7. When potential adverse effects on VGs are identified, appropriate action plans of measures to avoid, minimize, mitigate, or compensate for these adverse effects drawing on the information presented in Section 6.
8. The cost estimates and financing plan for the VGP; each project will bear full cost of assisting and rehabilitating VGs.
9. Accessible procedures appropriate to the project to address grievances by the affected VGs arising from project implementation. When designing the grievance procedures, the government takes into account the availability of judicial recourse and customary dispute settlement mechanisms among the VGs'.
10. Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the VGP. The monitoring and evaluation mechanisms should include arrangements for the free, prior, and informed consultation with the affected VGs'.

CHAPTER SIX

FRAMEWORK FOR FREE, PRIOR AND INFORMED CONSENT

6.1 Background

ESS7 recognizes that Vulnerable Groups have identities and aspirations that are distinct from mainstream groups in national societies and often are disadvantaged by traditional models of development. In many instances, they are among the most economically marginalized and vulnerable segments of the population. Their economic, social, and legal status frequently limits their capacity to defend their rights to, and interests in, land, territories and natural and cultural resources, and may restrict their ability to participate in and benefit from development projects. In many cases, they do not receive equitable access to project benefits, or benefits are not devised or delivered in a form that is culturally appropriate, and they may not always be adequately consulted about the design or implementation of projects that would profoundly affect their lives or communities.

This ESS recognizes that the roles of men and women in VGs cultures are often different from those in the mainstream groups, and that women and children have frequently been marginalized both within their own communities and as a result of external developments and may have specific needs.

One of the key requirements of ESS7 is to ensure that VGs present in, or with collective attachment to, the project area are fully consulted about, and have opportunities to actively participate in, project design and the determination of project implementation arrangements. The scope and scale of consultation, as well as subsequent project planning and documentation processes, will be proportionate to the scope and scale of potential project risks and impacts as they may affect VGs

In recognition of this vulnerability of VGs, the Bank require the government to obtain the Free, Prior and Informed Consent (FPIC) of the affected VGs when such circumstances described in ESS7 are present.

6.2 Free, Prior and Informed Consent

Free, Prior and Informed Consent (FPIC), refers to the process, under certain specific circumstances set out below, whereby Vulnerable Groups, will be consulted in good faith based on sufficient and timely information concerning the benefits and disadvantages of a project and how the anticipated activities occur. Consent refers to the collective support

of affected VGs for the project activities that affect them, reached through a culturally appropriate process. FPIC does not require unanimity and may be achieved even when individuals or groups within or among affected VGs explicitly disagree.

The FPIC principles are as follows:

- **Free** – people are able to freely make decisions without coercion, intimidation or manipulation
- **Prior** – sufficient time is allocated for people to be involved in the decision-making process before key project decisions are made and impacts occur
- **Informed** – people are fully informed about the project and its potential impacts and benefits, and the various perspectives regarding the project (both positive and negative)
- **Consent** - refers to the collective support of affected Indigenous Peoples communities/Sub-Saharan African Historically Underserved Traditional Local Communities for the project activities that affect them, reached through a culturally appropriate process.

Where applicable, FPIC applies to project design, implementation arrangements and expected outcomes related to risks and impacts on the affected VGs. It builds on and expands the process of meaningful consultation that should be established through good faith negotiation between Project and the VGs. The Project will document:

- the mutually accepted process to carry out good faith negotiations that has been agreed by the Borrower and the VGs; and
- the outcome of the good faith negotiations between the government and VGs, including all agreements reached as well as dissenting views.

The process for achieving FPIC if required will need to be developed for each of the VGs in turn taking into account their distinct characteristics, decision making structures and the sub-project impacts. The process will be included in the VGP that will be developed for each sub-project, where applicable. The key steps involved in the process are analysed in Table 6-1.

Table 6-1: FPIC Process for Vulnerable Groups

Consultation Stage	Consultation Participants		Consultation Method	Expected Outcome
	Project authority	Community		
Location of project activity	LGAs and other stakeholders	VGs, organizations community leaders/elders, Community Management Committees (CMC)s, Village Councils (VCs)	Open meetings and discussions, visit proposed subproject sites	First hand assessment and VG perceived social benefits and risks and prospect of achieving broad support for the project. Explanation of VG rights under law and ESS7
Initial screening of the proposed sub projects with FPIC requirements	LGAs and other stakeholders	VGs, CBOs, Community leaders/elders, Influential people, key informants, CMCs, VCs	Open meetings, focus group discussion and spot interviews	Identification of FPIC circumstances/scenarios/ mechanisms
Secondary screening of the proposed sub projects with FPIC requirements	LGAs and other stakeholders	VGs, CBOs, Community leaders/elders, Influential people, key informants, CMCs, VCs	Open meetings, focus group discussion and spot interviews	Identification of major impact issues, feedback from VGs who would be affected by the project
In depth study of risks and benefits of any of the applicable FPIC scenarios taking into consideration inter alia, the	LGAs, NGOs, CBOs, other knowledgeable persons	VGs including likely affected CBOs organization, community leaders, influential people/leaders,	Formal/informal interview, focus group discussion, hotspot discussion on specific impact alternative and mitigation	More concrete view of impact issues & risks, and feedback on possible alternative, mitigation and development measures or a proposal not to

Consultation Stage	Consultation Participants		Consultation Method	Expected Outcome
	Project authority	Community		
conditions that would lead to FPIC being achieved.		key informants, CMC, VC		proceed with certain sub project because FPIC is unlikely to be achieved.
Stakeholder Engagement	LGAs, NGOs, CBOs, other knowledgeable persons	Adversely affected individual VGs/ households	Community discussion, structured survey questionnaires covering quantitative & qualitative information/ issues	Confirmation of FPIC, inputs/ mechanisms for VGs and identification of issues that could be incorporated into design of the sub projects
Preparation of VGP	LGAs and other stakeholders	VGs, organizations, community leaders/elders, adversely affected VGs	Group consultations, hotspot discussion,	Preparation of VGPs, and incorporation of SA inputs to avoid or minimize adverse impacts, promote culturally appropriate benefit sharing and other VG development projects. Achievement and documentation of FPIC through agreed mechanisms or decision not to proceed with the Project.
Implementation	SCT, LGAs, and other stakeholders	Individual VGs, organizations, community	Implementation monitoring committees	Quick resolution of issues, including through Grievance

Consultation Stage	Consultation Participants		Consultation Method	Expected Outcome
	Project authority	Community		
		leader/elders, other stakeholders, CMCs, VCs.		Mechanism, effective implementation of VGPs
Monitoring and Evaluation	MoEST, PO, RALG, LGAs,	VGs organizations/groups and individuals, NGOs & CBOs	Formal participation in review and monitoring	Identification and resolution of implementation issues, effectiveness of VGPs

6.3 Conditions Under Which FPIC is Required.

FPIC may be required in relation to the development of sub-projects under Component 3 in which new schools will be constructed or existing schools expanded. In particular, FPIC would be applied when sub projects:

- i. have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;
- ii. cause relocation of VGs from land and natural resources subject to traditional ownership or under customary use or occupation; or
- iii. have significant impacts on the cultural heritage of VGs that is material to their identity and/or cultural, ceremonial, or spiritual aspects of their lives.

While it is considered unlikely that other aspects of SEQUIP will impact on the cultural heritage of VG the possibility remains eg enrollment in school may be seen as incompatible with traditional lifestyles of pastoralists groups or rites of passage thereby eroding the cultural heritage of the VG. Such impacts will be identified through the development of the social assessment of the vulnerable groups, which will include engagement and the need for FPIC on such elements will be determined in consultation with the VG.

CHAPTER SEVEN

STRATEGY FOR PARTICIPATION AND CONSULTATION WITH VULNERABLE GROUPS

7.1 Disclosure of the VGPF

The Vulnerable Groups Planning Framework will be made available to the affected vulnerable groups in an appropriate form, manner, and language. Once the Bank accepts the documents as providing an adequate basis for project appraisal, the Bank will make them available to the public in accordance with Bank Policy on Disclosure of Information, and the GoT will also make the documents available to the affected communities in the same manner through press releases.

For project activities with significant Vulnerable Group Community members, the VGPF will be disclosed to the affected VG with detailed information of project activities. This will be done through public consultation and made available in brochures, leaflets, or booklets, using the national and local language where it can be written. Summaries of the VGPF and subsequent VGPs will be made available in hard copies and in the national language at LGAs offices. Electronic versions of the VGPF will be available on the official website of MoEST, PO-RALG and the World Bank external website after approval and clearance of the VGPF and each sub-project/ district VGP by the Bank.

7.2 Stakeholder Engagement During Implementation

7.2.1 Stakeholder Identification

Where the project affects VGs, the SCT will engage in meaningful consultation with them and will ensure that it:

- i. Establishes an appropriate gender and inter-generationally inclusive framework that provides opportunities for consultation at each stage of project preparation and implementation among the implementing structures, the VG's, CBOs if any, and other local Civil Society Organizations (CSOs) identified by the affected VG's;
- ii. Uses consultation methods appropriate to the social and cultural values of the affected VGs and their local conditions and, in designing these methods, gives special attention to the concerns of VG's women, youth, and children and their access to development opportunities and benefits; and
- iii. Provides the affected VGs with all relevant information about the project (including an assessment of potential adverse effects of the project on the affected

VGs communities) in a culturally appropriate manner at each stage of project preparation and implementation.

All the interested and affected stakeholders will be identified through a culturally appropriate process for consulting with the VGs at each stage of project implementation. A stakeholder mapping exercise will be conducted where there is a likelihood of VGs being affected by Project activities and the stakeholder mapping process will ensure that all the interested and affected stakeholders are identified and included in the social assessment process including impact identification and mitigation.

7.2.2 Stakeholder Consultation Approach

Consultations with the vulnerable communities will be conducted at each stage of the project, and particularly prior to implementation, to fully identify their views and ascertain community support for the Project. The SCT will facilitate and arrange for consultative meetings with VGs in the Project area.

Such consultation will include use of VG local languages, articulation by VGs of their views and preferences and allowing time for community support. Representatives of the VGs in collaboration with Village Council in the project area will select a venue that is considered appropriate by all the parties.

Engagement will be based on honest and open provision of information, and in a form that is accessible to VGs. Engagement will begin at the earliest possible stage and prior to on-the-ground activity implementation.

In practice, good community engagement in the context of Vulnerable Groups aims to ensure that:

- i. Vulnerable Groups have an understanding of their rights
- ii. Vulnerable Groups are informed about, and comprehend the full range (short, medium and long-term) of social impacts – positive and negative – that can result from the proposed activities
- iii. Any concerns that Vulnerable Groups have about potentially negative impacts are understood and addressed by SCT and LGAs.
- iv. Traditional knowledge informs the design and implementation of mitigation strategies and is treated respectfully
- v. There is mutual understanding and respect between SCT and the Vulnerable Groups as well as other stakeholders

- vi. Vulnerable Groups aspirations are taken into account in project planning so that people have ownership of, and participate fully in decisions about, community development programs and initiatives
- vii. The project has the broad, on-going support of the Vulnerable Groups, the voices of all in the Vulnerable Groups are heard; that is, engagement processes are inclusive.

In preparing the VGP, information will be gathered through consultations with stakeholders by separate group meetings with Vulnerable Groups, including their leaders, NGOs, CBOs, and affected persons. Discussions will focus on potential positive and negative impacts of implementing project for the VGs, measures to enhance positive impacts, and, strategies/options to minimize and/or mitigate negative impacts.

The stakeholder’s engagement process will be conducted using documentation review, interviews with key informants, and focus group discussions and Special Village Assembly Meetings with VGs, and other identified Civil Society Organizations (CSOs). The process will generate data and information based on the indicators summarized in Table 7-1 below

Table 7-1: VG Stakeholders Engagement Process Matrix

Issues	Activity	Responsible	Indicators
Screening	Meeting with VC, School Construction Committee and Traditional Leaders	LGA	<ul style="list-style-type: none"> • Screening Forms completed
Orientation and Mobilization of VGs	Community meetings	LGAs, VGs and VC representatives	<ul style="list-style-type: none"> • Number of community meeting minutes, • Number of VGs attended • Total number of participants in place
Consultations with VGs	Participatory Rural Appraisals	LGA, VGs, and VC representatives	<ul style="list-style-type: none"> • General Village Assembly meeting minutes,

Issues	Activity	Responsible	Indicators
			<ul style="list-style-type: none"> • Attendance of VGs by categories, • Detailed social screening report, • FPIC if required
Development of strategies for participation of VGs and mitigation measures for identified concerns / issues	Participatory planning with VGs	LGA, VGs, and VC representatives	<ul style="list-style-type: none"> • Attendance of VGs by categories, • Planning report • List of positive impacts to be strengthened, • List of negative impacts to be mitigated, • Compensation measures if required
Carry out capacity building for VGs if need arise	Conduct information sharing sessions	LGA, VGs, and VC representatives	<ul style="list-style-type: none"> • List of VGs attendance, • Minutes of meetings, • Information sharing reports
Participatory M&E process with VGs to carry out M&E	To conduct participatory monitoring	LGA, VGs, and VC representatives	<ul style="list-style-type: none"> • Joint monitoring reports accessible to VGs and implementing agencies, • List of VGs representatives attended the process

The participatory stakeholder's engagement and, where applicable, the FPIC results will determine whether to proceed with a respective sub-project or not. In case it is agreed to proceed, the LGA facilitator will prepare the following:

- a. The findings of the stakeholder engagements;
- b. Where applicable, the process of FPIC with the affected VG communities. This would include additional measures, such as project design modification, to address adverse effects on the VGs and to provide them with culturally appropriate project benefits;

- c. Recommendations for an FPIC process with PAPs and participation by VGs during project implementation, monitoring, and evaluation; and
- d. Any formal agreements reached with VGs.

The Consultation process will document the community general assembly minutes with attendance lists and VG members' lists, photographic evidence and minutes of other meetings and/or back-to-office reports.

7.2.3 Stakeholder Engagement During Design and Implementation

Participation of VGs in selection, design and implementation of the project components, will largely determine the extent of achievement of VGPF objectives. To ensure that benefits are realized and where adverse impacts are likely, the LGA team will undertake prior and informed consultations with the likely affected VGs and those who work with and/or are knowledgeable of VGs' development issues and concerns. To facilitate effective participation, the VGF will follow a timetable to consult VGs at different stages of the project cycle, especially during preparation and implementation of the VGFs. The primary objectives would be to examine the following:

- i. To seek their inputs/feedback on how to maximize benefits, accessibility and how to avoid or minimize the potential adverse impacts associated with the project;
- ii. Identify culturally appropriate impact mitigation measures; and
- iii. Assess and adopt education opportunities, which the SA could promote to complement the measures required to mitigate the adverse impacts.

Consultations will be carried out broadly in two stages. First, prior to final selection of any project component located in an area inhabited by VGs. The SCT will consult the VGs about the need for and the probable positive and negative impacts associated with the project execution. Second, during preparation (including of plans such as the ESMP), to ascertain how the VGs in general perceive the project and gather any inputs/feedback they might offer for better outcomes. This will eventually be addressed in VGF and inform the design of the project.

The VGs communication strategy will;

- i. Facilitate participation of VGs with adequate gender and generational representation; Youth, customary/traditional VG organizations; community

elders, VC leaders; and civil society organizations, CBOs and FBOs on VGs development issues and concerns.

- ii. Provide them with relevant information about the project components, including that on potential adverse impacts, organize and conduct the consultations in manners to ensure free expression of their views and preferences.
- iii. Document details of all consultation meetings, with VGs perceptions of the proposed project and the associated impacts, especially the adverse ones and any inputs/feedbacks given by VGs; and an account of the community support or consent by VGs.

The SA will examine the detailed impacts at an individual and community levels, with a particular focus on the adverse impacts perceived by VGs and the feasible mitigation measures. To ensure continuing informed participation and more focused discussions, the communication strategy will provide affected VGs with the impact details of the proposed project. Consultations will cover areas concerning cultural and socioeconomic characteristics, as well as what VGs consider important. Consultations will continue throughout the preparation and implementation period. Consultation stages, probable participants, methods, and expected outcomes are suggested in the VGs consultation matrix shown in Table 7-3.

The following strategies should also be included in the project to support the participation of the VGs:

- i. The project should explore how to accommodate the most vulnerable and destitute of the VGs.
- ii. Encourage VGs to get involved in various project planning, designing, and implementation activities in the project through arranging related training.
- iii. Assist VG youth to develop their capacity and capability to enable them to participate in proposed project components;
- iv. Ensure adequate resources and technical support for the implementation of the action plan for VGs.
- v. At all stages culturally appropriate communication methods (verbal and nonverbal, in local language) should be used to ensure meaningful consultation.

Once the VGs are identified in the project area, the VGPs will ensure mitigation of any adverse impact of the project. The project components should ensure benefits to the VGs by providing (in consultation with the VGs themselves) opportunity to get them involved

in various project activities. The following issues need to be addressed during the implementation stage of the project;

- i. Provision of an effective mechanism for monitoring implementation of the VGF;
- ii. Development of accountability mechanism to ensure the planned benefits of the project are received by VGs;
- iii. Ensuring appropriate budgetary allocation of resources for the VG development.
- iv. Provision of technical assistance for sustaining the VGP;
- v. Ensure that VGs traditional social organizations, cultural heritage, traditional political and community organizations are protected.

7.2.4 Strategies for Inclusion of Women and Youth

This VGF establishes an appropriate gender and inter-generationally inclusive framework that provides opportunities for consultation each stage of project preparation and implementation with the affected VGs.

Deliberate efforts need to be put in place to ensure full participation of women and youth. In particular, SCT and LGAs need to be sensitive to the exclusion of women and young people in the decision-making process. During the Social Assessment undertaken to inform the VGP for all components, where it is determined that traditional decision-making structures exclude women and younger people, it may be necessary to obtain input from these groups by less direct means (for example, and where possible, via community needs surveys and baseline studies, or through informal discussions with small groups).

Table 7-2: VGs Consultation Matrix

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	VGs Community		
Reconnaissance for all Components Ground verification of existing location/sites for activities under Component 3	SCT, project consultants and other stakeholders	VGs, including organizations, community leaders/elders	Open meetings and discussions Visit of proposed project sites (for component 3), VGs settlements and surroundings	First-hand assessment of VGs' perception of potential social benefits and risks
Screening of the proposed activities	SEQUIP, project consultants and other stakeholders	VGs, including CBOs community leaders/elders, key informants	Open meetings focus group discussions, interviews, etc.	Identification of major impacts, feedback from VGs and would-be affected persons
In-depth study of risks and benefits taking into consideration, inter alia the conditions that lead to achieve FPIC.	SEQUIP, project consultants, NGOs / CBOs, other knowledgeable persons	Would-be affected VGs, VGs, organizations, Community leaders/elders, key informants	Formal and informal interviews; focus group discussions; on specific impacts, alternatives, and mitigation; etc.	More concrete view of impact issues and risks, and feedback on possible alternatives and mitigation and development measures
Social Assessment (SA)	SEQUIP, project consultants	Adversely affected individual VGs/households	Survey Questionnaires covering quantitative and	Inputs for VGP, and identification of issues that could be incorporated into the design of project

			qualitative information	
Preparation VGP	SEQUIP, Project consultants and other stakeholders	VGs, VCs CBOs, community leaders, elders and adversely affected VGs	Group consultations, FGD	Preparation of VGP, and incorporation of SA inputs into design to avoid or minimize adverse impacts and promote culturally appropriate benefit sharing, and VGs development programs Agreement on the GRM approach
Implementation	SEQUIP, Project, consultants and other stakeholders	Individual VGs, CBOs, VCs, community leaders, elders and other stakeholders	Implementation monitoring committees (formal or informal)	Quick resolution of issues, effective implementation of VGP
Monitoring & Evaluation	SEQUIP, Project, consultants (NGOs & CBOs)	VGs, CBOs, groups and individuals	Formal participation in review and monitoring	Identification and resolution of implementation issues, effectiveness of VGP

CHAPTER EIGHT

GRIEVANCE REDRESS MECHANISM

8.1 Purpose

A Grievance Redress Mechanism (GRM) is necessary for addressing the legitimate concerns of the project affected persons. Grievance handling mechanisms provide a formal avenue for affected groups or stakeholders to engage with the project on issues of concern or unaddressed impacts. Grievances are any complaints or suggestions about the way a project is being implemented, and they may take the form of specific complaints for damages/injury, concerns around resettlement and compensation, concerns about routine project activities, or perceived incidents or impacts.

The Environmental and Social Standards requires project financed by the World Bank to define one or more mechanisms to resolve complains, issues, recommendations, presented by the project stakeholders, citizens or anyone expressing concerns on the environmental, safety and social project development. This Section responds to the ESS10 of the ESF of the World Bank but also complies with national regulations.

The mechanism for grievance redress shall include:

- Provision for the establishment of a grievance redress committee that includes women, youth and vulnerable groups
- A reporting and recording system
- Procedure for assessment of the grievance
- A time frame for responding to the grievances filed
- The mechanisms for adjudicate grievances and appealing judgments
- A mechanism for monitoring grievances

The stakeholder engagement process will ensure that the PAPs are adequately informed of the procedure. The GRM is designed with the objective of solving disputes at the earliest possible time, which will be in the interest of all parties concerned and therefore, it implicitly discourages referring such matters to a tribunal/court for resolution.

8.2 Principles

The project SEQUIP will adopt grievance redresses mechanisms (GRMs) that will be transparent, objective and unbiased and will take both environmental and social grievances into consideration. Steps to file grievances and seek action shall be simple enough for communities to understand.

In the interest of all parties concerned, the grievance redress mechanisms are designed with the objective of solving disputes at the earliest possible time. A good GRM emphasize that all stakeholders should be heard and as such, they must be fairly and fully represented. Identifying and responding to grievances supports the development of positive relationships between projects and affected groups/communities, and other stakeholders.

Due to the nature of the Project and the various components under implementation three GRMs will be implemented to allow stakeholders grievances to be responded to by the appropriate entity at the appropriate level.

- **School Construction GRM:** This will be administered by the Schools Construction Committee and the Village Council who will form a School Grievance Committee and will address grievances associated with the construction of new schools and rehabilitation of existing schools including grievances related to land and contractor's (workers) grievances.
- **Operational Schools GRM:** This will be administered by the school guidance counsellors in schools and will be established as part of the safe schools program.
- **General GRM:** MoEST and PO-RALG each operate a GRM for any issues that people may have. This GRM can be utilised to raise issues directly to the ministry on the various components of the Project.

8.3 School Construction GRM

The GRM will operate at three levels:

Level One: The procedure at the first level will seek to resolve an issue quickly, politely, and transparently out of courts in order to facilitate project activities to move forward. The School Grievance Committees (SGCs) will act as the first tier for responding to grievances that may arise due to school level development activities. The SGCs will have representatives from the school, the school construction committee and from the village council. The SGC will appoint a Community Liaison Officer (CLO) who will facilitate

grievance management between the various levels and the recording of grievances. The CLO shall raise awareness of the GRM, maintain records in the Grievances/claims notebook where grievances and complaints, including minutes of discussions, recommendations and resolutions made, will be recorded/written. The CLO will be responsible for making sure the recommendations of the GRC are implemented and directing contractors to make any appropriate change to their work.

Level Two: Grievances that can't be resolved by the SGC will be referred to the Village Council (VC) who will be responsible for receiving and resolving grievances in a fair, objective, and constructive manner, all claims or complaints raised by project affected persons within the communities affected by the Project. Existing mechanisms such as the Village Land Tribunal will be utilised as needed to address complaints on specific issues. As needed the VC will seek technical support from the LGA to investigate and respond to grievances.

Level Three: Should a complainant remain unsatisfied with the resolution they have the right to take their grievance to the appropriate department, tribunal at the LGA or Regional Level to seeks resolution. Complainants will be advised as to the available Level Three redress mechanisms as needed.

Legal Redress: Where grievances can't be resolved the complainant has the right to seek legal redress through the courts. All efforts will be made to avoid the need for legal proceedings through negotiations and agreements with complainants.

The CLO in the SGC will be responsible for supporting the various committees in developing responses to grievances and monitoring the grievance mechanisms for the various sub-projects to ensure that the mechanism is being implemented appropriately.

Grievance Procedure

a) Step 1: Submission of Grievances

The affected person shall file his grievance to the SGC, which will be recorded in writing by the CLO. The grievance note should be signed and dated by the aggrieved person.

A grievance can be submitted to in a number of ways as follows:

- i. through suggestion box which is accessible at the school environment or at the construction site.
- ii. during regular meetings held between communities, the SGC, VC or LGA;
- iii. through the Local Consultative Forums established in the affected villages;

- iv. during informal meetings with the SGC, VC or LGA;
- v. through communication directly with management – for example a letter addressed to site management; and
- vi. Email, what's app messages and telephone (where appropriate).

All complaints about abuse in service, potential corruption must be channelled to proper authorities no more than 5 days after the complaint is received.

b) Step Two: Logging the Grievance

The SGC keeps records of all complaints received, whether and how the SGC resolved them, and which complaints were forwarded to the VC. Once a grievance has been received it must first be logged in the grievance database register by the SGC. A sample grievance logging form is provided in Annex 3.

Anonymous grievances will be accepted recognizing that this may limit the possibility of investigation and resolution. Those who collect grievances will be trained on how to collect grievances related to GBV in the appropriate manner (see below).

c) Step Three: Providing the Initial Response

The person or community or stakeholder that lodged the initial grievance will then be contacted within 2-3 days to acknowledge that SGC has received the complaint. This response will either accept or refute responsibility for the grievance. This notification will include details of the next steps for investigation of the grievance, including the person/department responsible for the case and the proposed timeline for investigation and resolution which will depend on the severity of the incident. In some cases it may be necessary to provide an immediate response to avoid further harm while more detailed investigations are undertaken eg in the case of fatalities, workplace accidents, community safety pollution of natural resources, conflict with communities etc.

d) Step Four: Investigating the Grievance

The SGC will aim to complete investigation within two weeks of the grievance first being logged. Depending on the nature of the grievance, the approach and personnel involved in the investigation will vary. A complex problem may involve external experts for example. A more simple case may be easier, and quicker to investigate. The SGC will involve the aggrieved person/people in this investigation, where possible, to ensure participation. The SGC will continually update the aggrieved on the progress of the investigation and the timeline for conclusion. Unless highly complex, the investigation

should be completed within 14 days, although efforts should be made to complete this process faster.

e) Step Five: Communication of the Response

The SGC will outline the steps taken to ensure that the grievance does not re-occur and any measures needed to resolve the complaint. The response will be communicated within 1 day of the resolution being determined.

f) Step Six: Complainant Response

If complainant is satisfied then SGC should seek their sign off from the complainant and determine what if any follow up is needed to monitor the implementation of the resolution. The resolution should be implemented promptly. This may happen at the time the resolution is proposed or within a timeframe agreed between the SGC and complainant but ideally within 5 days.

g) Step Seven: Grievance Closure or Taking Further Steps if the Grievance Remains Open

Once the measures have been implemented to the complainant's satisfaction the grievance should be closed. If, however the grievance still stands then the SGC will initiate further investigation and determine the steps for future action. Once all possible redress has been proposed and if the complainant is still not satisfied then they should be advised of their right to appeal to the next level as outlined above.

If the grievances can not be resolved at the LGA or Regional level, the complainant should be advised of their right to legal recourse.

Land related grievances shall be resolved using the land courts established under the Land Disputes Courts Act. No. 2 of 2002 with its regulations. The courts are: The Village Land Council; The Ward Tribunal; The District Land and Housing Tribunal; The High Court (Land Division) and The Court of Appeal of Tanzania. However, where village(s) or wards have not established Village Land Council(s) or Ward Tribunals respectively, prior to the commencement of a project, the District Council shall be required to make sure that the village(s) or Ward establishes Village Land Council(s) or Ward Tribunal. Likewise, where district land and housing tribunal are not in place prior the commencements of a project, grievances shall be referred to tribunals having jurisdiction. Heirs related grievances shall be resolved using the Probate and Administration of Estates Act Cap 352.

Gender Based Violence (GBV)

The Project may result in incidences of Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) affecting workers and the community. GBV cases are different from other complaints that are typically handled through the grievance redress mechanisms.

As outlined in the ESMF, a GBV action plan will be developed for the Project and will be modified for each LGA once service providers have been identified. A GBV referral pathway will be identified in each district mapping services with the appropriate capacity and quality of service delivery.

The SGC will be trained on how to manage GBV related grievances including matters of confidentiality, treating survivors with empathy and what non-identifiable data should be collected and how to close the case. In addition, members of the village council will also be trained on how to receive and manage this information. However, the Village Council will not be involved in resolving GBV related cases as this will be determined by the survivor with support from the appropriate service providers based on their needs and wishes.

In cases involving a Project Worker, the contractor and LGA will be advised about the case who will in turn inform the GBV Specialist at the national level who will instigate any investigation required involving the contractor, LGA, services providers etc. They will then recommend action to be taken by the contractor/SCC in ensuring that administrative sanctions are taken against an alleged perpetrator of sexual assault.

Adaptation for Vulnerable Groups

This GRM will be presented to Vulnerable Groups and adapted as needed to meet their requirements and decision-making processes while maintaining the principles underlying the mechanism and the roles and responsibilities. Such adaptations will be discussed and agreed during the preparation of the Vulnerable Groups Plans but may include roles for traditional leaders and decision-making processes for example in addressing land issues. The aim for this adaptation is to ensure that vulnerable groups are able to raise their concerns in a manner they feel will be listened to and which they feel is accountable to them.

Operational Schools GRM

As part of the safe schools program each school will have one or two trained guidance and counselling teachers (depending on school size and gender composition) as grievance redress focal point for students and teachers. The GRM will be accessible to teachers and students who will be able to submit grievances into sealed suggestion boxes or in person. In case resolution cannot be reached the school head will be involved in the resolution. Should the issue be greater than can be resolved at the school level MoEST and/or PO-RALG representatives at the LGA will be brought in. The trained teachers will then help the complainant to resolve the issue in a manner which reduces conflict.

In relation to GBV, to increase mechanisms for reporting both the guidance and counselling teachers, a member of the Parent-Teacher Association or School Board and members of the village council shall be trained in how to receive GBV complaints to allow for multiple entry points. They will be trained on how to keep the matter confidential, treat the survivor with empathy and on the referral pathways. The GRM will refer the survivor to the GBV Service Provider(s) who will support the survivor to report the case to the police (recognising that there is mandatory reporting in relation to children in some instances) and access other services. The service provider will maintain confidentiality in the process, understand the criteria for mandatory reporting and inform the child of the same so they are aware, report only the minimum information required and consider the impact of reporting and how to address these impacts.

General Grievances

Currently MoEST and PO-RALG operate independent Grievance Mechanisms through which complaints and concerns can be submitted regarding wider issues. At both Ministries there are Complaints Desks at the national level. Complaints can be submitted by emailing complaints@moe.go.tz or ps@tamisemi.go.tz phoning ^[ANK1] + 255 (26) 232 1 234, +255 26 296 3533. For PO-RALG, there is a suggestion/ complaint box at each LGA and complaints boxes are placed in schools. Grievances related to SEQUIP should be forwarded to the SEQUIP Coordination Team to be addressed.

8.4 Record Keeping

All comment responses and, grievances are to be logged using grievance logging forms and registers. This includes details of the claim/grievance/complaint, the claimant/aggrieved, and ultimately the steps taken to resolve the grievance. A master database will be maintained by the SGC to record and track management of all grievances.

8.5 Monitoring

It is vitally important to monitor the effectiveness of the grievance mechanism. Appropriate measures for this include monthly reporting on the number of grievances received, resolved and outstanding and associated timeframes. This will be undertaken by the SGC and reported to LGA. As part of stakeholder engagement and consultation, involving the views of the stakeholders for whom the Grievance Mechanism is designed will be part of SCT Monitoring.

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CHAPTER NINE

INSTITUTIONAL ARRANGEMENTS FOR IMPLEMENTATION OF VGP

9.1 Institutional Arrangements of SEQUIP

SEQUIP will be implemented by MoEST and PO-RALG. MoEST will be responsible for overall monitoring and evaluation, setting of standards and quality assurance, and PO-RALG, through the Regional Administrative Secretary (RAS) and LGAs, will be responsible for day-to-day implementation of project activities. The management of the project will be under the SEQUIP Coordination Team (SCT). The SMPE and the GBV Specialist from the SCT will be full involved in the implementation of VGPF though out the implementation of the project. They will be responsible for training, supporting and working with LGAs experts in the preparation, implementation and monitoring of the VGPs.

Overall, strategic oversight of SEQUIP is under the responsibility of the Senior Management Team (SMT), co-chaired by the Permanent Secretaries of both MoEST and PO-RALG. This body provides strategic direction and a more equitable voice for PO-RALG as a co-implementer of the program. At the Regional level, the Regional Administrative Secretary (RAS) will supervise and provide technical support to LGAs and report to Presidents' Office, Regional Administration and Local Government (PO RALG).

At the LGAs level, the Program is managed by the Council Director, supported by Council Management Team (CMT). The overall coordination of the Program will be vested to the District Secondary Education Officer, with technical support of CMT. Moreover, the Council Director will assign the Community Development Officer to oversee the development and implementation of VGP.

At the community level, the governance is under Village/ Mtaa Council, whereby administrative roles are executed by Village/ Mtaa Executive Officers. The community administration is directly linked with its people, and it is at this level that community meetings are organized for the purpose of public consultation, involvement and notable participation into development activities such as projects design, planning and implementation. The detailed description on the roles of each above-mentioned level is displayed below.

9.2 Roles of stakeholders during implementation of VG Plan

Different stakeholders will play the following roles in relation to the planning and implementation of project specific Vulnerable Group Plans as follows:

9.2.1 Village and Ward levels

Village Councils are responsible for the planning, implementation; monitoring and evaluation of project specific VG Plans. Specific responsibilities include:

- i. Awareness creation in the community about the VG Plans;
- ii. Participating in data collection from the community;
- iii. Facilitating meetings with VGs and other stakeholders;
- iv. Participating in the planning, implementation, monitoring and evaluation of project specific VG plans at the village level;
- v. Establishing and maintaining grievance databases for the VGs; and
- vi. Addressing grievances from VGs.

9.2.2 LGA Level

The LGAs will be responsible for overall planning and management of the VG Plans as follows:

- vii. Awareness creation at Ward and Village level about the VGP;
- viii. Facilitating community identification of key activities to be included into subproject specific VG Plans;
- ix. Providing technical assistance to village leaders, VG and local communities as needed in the preparation of subproject specific VGPs;
- x. Ensuring that VG Plans are mainstreamed into LGAs Annual plans;
- xi. Participating in the planning, implementation, monitoring and evaluation of subproject specific VG Plans at LGAs levels;
- xii. Reviewing and compiling quarterly progress reports on the implementation of VG Plans;
- xiii. Establishing and maintaining updated grievance databases
- xiv. Monitoring and evaluation of the implementation of the VG Plans; and
- xv. Undertaking Social Assessments and developing VGPs.

9.2.3 National Level

At the national level, there will be three bodies, namely the, SEQUIP Senior Management Team (SSMT), Policy and Planning Department under MoEST with the counterpart Department of Education Administration under PO RALG and SEQUIP Coordination Team (SCT) and their roles will be as follows:

- i. Ensuring compliance of the VG Plans with safeguards requirements;
- ii. Providing technical support and capacity building for LGAs, community and other stakeholders on the implementations of the VGP;
- iii. Monitoring and evaluation of the impacts of VGP implementation at the community level;
- iv. Reviewing and compiling quarterly progress reports on the implementation of VGP plans;
- v. Establishment and maintenance of effective M&E system including grievance database at this level; and
- vi. Knowledge management and learning

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CHAPTER TEN

MONITORING, EVALUATION AND REPORTING

All projects results indicators will be disaggregated by gender to monitor women's participation in the interventions. The projects will also enhance inclusion of VGs who are living in the targeted LGAs. The MoEST will establish a monitoring system to ensure effective implementation of VGPs. A set of monitoring indicators will be determined during VGP implementation.

For any project found to have significant adverse impacts on VGs, the participatory approach involving external experts, NGOs, LGAs experts, MoEST and PO RALG and the community will be engaged to verify information of the project specific VG Plans. The SCT will advise on compliance issues and if any significant issues are found, a corrective action plan will be prepared and update accordingly.

10.1 Monitoring Indicators

Several key indicators and subjects for monitoring and evaluation of VG Plans at community levels includes;

- (i) process of consultation activities;
- (ii) economic status of VGs in comparison with pre-project conditions;
- (iii) status of VGs as identified in the SA;
- (iv) any negative impacts to the VGs that was not anticipated during the preparation of VG Plans at the community level and which require corrective actions;
- (v) grievance issues opened and addressed
- (vi) Number of FPIC Processes developed and implemented
- (vii) Number of sub-projects including VGs.

Required data/information will be collected and analyzed regularly to indicate progress on implementation of VG Plans, project outputs, outcomes and impacts.

10.2 Quarterly Reporting and Performance Review

Quarterly progress reports will be prepared by the District Secondary Education Officer at with technical support of Community Development Officer, and the Environmental and social safeguards experts in the project. These reports will be submitted to the Regional Administrative Secretary and forwarded to SSMT for consolidation and later to the World Bank. Indicators are as per Table 10-1 below.

Table 10-1 : Monitoring and Evaluation Indicators

Issues	Indicator	Responsibility	Data Sources
Capacity Building for staff	<ul style="list-style-type: none"> - Number of individuals and institutions trained - List of participants - Training reports 	MoEST & PORALG	Training reports
VG Orientation and Mobilization meetings	<ul style="list-style-type: none"> -Number of meetings conducted - Number of VG members sensitized Number of groups involved 	MoEST & PORALG	Survey reports; Community meeting reports
Consultations with VG	<ul style="list-style-type: none"> -Attendance of Participatory Rural Appraisal (PRA) -PRA reports acceptable to VG -Participation by gender and categories of VGs 	MoEST & PORALG	PRA tools PRA reports
Mapping of community resources critical to VGs	<ul style="list-style-type: none"> - List of VGs participated (including participation by VGs and by gender) - Reports verified and accepted by VG 	PORALG	-Baseline survey reports; -Community transect reports
Development of strategies for participation of VGs in the Program and mitigation measures	<ul style="list-style-type: none"> -Number of sub-projects passed by social screening -Number of projects implemented -Participation by gender and categories of VGs -Number/proportion of beneficiaries 	MoEST & PORALG	-progress reports; --LGAs reports
Capacity Building	<ul style="list-style-type: none"> - Number of Trainings - Attendance by VGs - Training report 	MoEST & PORALG	Training reports

Issues	Indicator	Responsibility	Data Sources
M&E	<ul style="list-style-type: none"> - Number of Monitoring visits -Number of VG participants in monitoring teams -Monitoring report 	MoEST & PORALG	M&E reports

10.3 BUDGET FOR IMPLEMENTATION OF VG PLAN

For implementation of VG Plans, the LGA Facilitators will conduct awareness raising, to the VGs on the various SEQUIP activities. This will be followed by detailed community based participatory planning entailing identification of possible subprojects to be implemented. The average estimated budget for awareness raising and developing a specific VG Plan is USD 43,478.20 activity. This budget entail awareness raising, microplanning, and inputs for implementation in seven districts were VGs are mostly found.

ANNEX 2: ADDITIONAL GUIDANCE ON FPIC

Impacts on Land and Natural Resources Subject to Traditional Ownership or under Customary Use or Occupation:

Where projects involve (a) activities that are contingent on establishing legally recognized rights to lands and territories that VGs have traditionally owned or customarily used or occupied or (b) the acquisition of such lands, LGAs will prepare a plan for the legal recognition of such ownership, occupation, or usage, with due respect to the customs, traditions and land tenure systems of the VGs. The objective of such plans will be the following: (a) full legal recognition of existing customary land tenure systems of VGs; or (b) conversion of customary usage rights to communal and/or individual ownership rights. If neither option is possible under national law, the plan includes measures for the legal recognition of VGs perpetual or long-term renewable custodial or use rights.

For example, extractive industries, creation of conservation areas, agro-development schemes, greenfield infrastructure development, land management or titling programs. Conversion of customary usage rights to individual ownership rights will only be an objective following consultation with the VGs concerned and assessment of the impacts of such conversion on the communities and their livelihoods. Such adverse impacts may include impacts from loss of access to assets or resources or restrictions on land use resulting from project activities.

If the government proposes to locate a project, or commercially develop natural resources, on land traditionally owned by, or under the customary use or occupation of VGs, and adverse impacts can be expected, the Borrower will take the following steps and obtain their FPIC:

- Document efforts to avoid and otherwise minimize the area of land proposed for the project;
- Document efforts to avoid and otherwise minimize impacts on natural resources subject to traditional ownership or customary use or occupation;
- Identify and review all property interests, tenurial arrangements, and traditional resource usage prior to purchasing, leasing or, as a last resort, undertaking land acquisition
- Assess and document VGs' resource use without prejudicing any VGs' land claim. The assessment of land and natural resource use will be gender inclusive and specifically consider women's role in the management and use of these resources;

- Ensure that affected VGs are informed of: their land rights under national law, including any national law recognizing customary use rights, the scope and nature of the project; and the potential impacts of the project and
- Where a project promotes commercial development of their land or natural resources, afford due process, and offer compensation together with culturally appropriate sustainable development opportunities to VGs, at least equivalent to that to which any landowner with full legal title to the land would be entitled, including:
 - Providing fair lease arrangements or, where land acquisition is necessary, providing land-based compensation or compensation in kind in lieu of cash compensation where feasible;⁸
 - Ensuring continued access to natural resources, identifying the equivalent replacement resources, or, as a last option,

If circumstances prevent the Government of Tanzania from offering suitable replacement land, they will provide verification that such is the case. Under such circumstances, government will provide non-land-based income-earning opportunities over and above cash compensation to affected VGs.

Typically, VGs claim rights and access to, and use of land and resources through traditional or customary systems, many of which entail communal property rights. These traditional claims to land and resources may not be recognized under national laws. Where VGs individually hold legal title, or where the relevant national law recognizes customary rights for individuals, the requirements of World Bank Environmental and Social Standard providing compensation and identifying alternative livelihoods if project development results in the loss of access to and the loss of natural resources independent of project land acquisition.

- Enabling VGs to share equitably in the benefits to be derived from the commercial development of the land or natural resources where the Borrower intends to utilize land or natural resources that are central to the identity and livelihood of affected VGs and the usage thereof exacerbates livelihood risk; and
- Providing affected VGs with access, usage, and transit on land the Borrower is developing subject to overriding health, safety, and security considerations.

Relocation of VGs from Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use or Occupation:

Government will consider feasible alternative project designs to avoid the relocation of VGs from communally held or attached land and natural resources subject to traditional ownership or customary use or occupation. If such relocation is unavoidable, government will not proceed with the project unless FPIC has been obtained as described above

Government will not resort to forced eviction and any relocation of VGs will meet the requirements of the World Bank's Environmental and Social Standard (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement) will apply, as and when necessary in the project. Where feasible, the relocated VGs will be able to return to their traditional or customary land, should the cause of their relocation cease to exist.

Cultural Heritage:

Where a project may significantly impact cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected VGs' lives, priority will be given to the avoidance of such impacts. Where significant project impacts are unavoidable, government will obtain the FPIC of affected VGs.

Where a project proposes to use the cultural heritage of VGs for commercial purposes, government will inform the affected VGs of:

- their rights under national law;
- the scope and nature of the proposed commercial development; and
- the potential consequences of such development; and obtain their FPIC.

Government will also enable VGs to share equitably in the benefits to be derived from commercial development of such cultural heritage, consistent with the customs and traditions of the VGs.

ANNEX 3 GRIEVANCE REDRESS FORMS

Grievance Logging Form

Contact Details of Complainant	Name:		
	Address:		
	Tel:		
	E-mail:		
How would you prefer to be contacted?	In Person	By phone	By email
Details of your comments, grievance, recommendation. Please describe the problem, how it happened, when, where and how many times, as relevant			
What are the complainant's suggestions to resolve the grievance?			

Details of how Grievance Submitted	In Person:	
	In Writing:	
	By Phone:	
	Other	
Signature of Complainant(s)		Date
Name of Person Receiving Complaint		Date Logged

Grievance Resolution Form

Contact Details of Complainant	Name:
	Address:
	Tel:
	E-mail:
Grievance Number	
Summary of Grievance	
Is the Complaint Project Related?	No
	Justification:
	Communication to Stakeholder (information, form and date):
Acceptance by Stakeholder: Yes _____ No _____	

	<p>Yes</p> <p>Cause:</p> <p>Communication to Stakeholder (information, form and date):</p>	
<p>Agreement Reached to Resolve Grievance</p>	<p>Yes _____ No _____</p> <p>Form of the agreement</p>	
<p>Next Steps (either to implement resolution or resolve grievances with dates and responsible parties)</p>		
<p>Signature of Complainant(s)</p>		<p>Date</p>

Signature of Grievance Committee		Date Logged

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